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Transcript of Isaac Lefkowitz, Designated Representative

Date: May 12, 2023

Case: In re: Tehum Care Services, Inc.

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Conducted on May 12, 2023

1 (1 to 4)

<p>1 UNITED STATES BANKRUPTCY COURT</p> <p>2 SOUTHERN DISTRICT OF TEXAS</p> <p>3 HOUSTON DIVISION</p> <p>4 ----- x</p> <p>5 In re : Chapter 11</p> <p>6 Tehum Care Services, Inc. : Case No. 23-90086 (CML)</p> <p>7 :</p> <p>8 Debtor :</p> <p>9 ----- x</p> <p>10</p> <p>11 Remote deposition of M2 LoanCo, LLC.,</p> <p>12 By and through its Designated Representative,</p> <p>13 ISAAC LEFKOWITZ,</p> <p>14 taken by the Official</p> <p>15 Committee of Unsecured Creditors</p> <p>16</p> <p>17 DATE: May 12, 2023</p> <p>18 TIME: 10:02 a.m. to 12:48 p.m. EST</p> <p>19 PLACE: - Remote -</p> <p>20 BEFORE: Lisa M. Barrett, RPR, CRR, CRC, CSR</p> <p>21 Stenographic Reporter, Notary Public</p> <p>22 JOB NO: 492510</p> <p>23</p> <p>24</p> <p>25</p>	<p>3</p> <p>1 C O N T E N T S</p> <p>2 EXAMINATION OF ISAAC LEFKOWITZ</p> <p>3 By Mr. Zluticky</p> <p>4</p> <p>5 E X H I B I T S</p> <p>6 (Attached to transcript.)</p> <p>7 DEPOSITION EXHIBITS</p> <p>8</p> <p>9 Exhibit 1 Notice of service of</p> <p>10 Subpoena to M2 LoanCo, LLC</p> <p>11</p> <p>12 Exhibit 2 Geneva facilitator agreement</p> <p>13 Bates Nos. m2LoanCo 00006620.</p> <p>14 to -6624</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>2</p> <p>1 A P P E A R A N C E S:</p> <p>2 ON BEHALF OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS:</p> <p>3 NICHOLAS ZLUTICKY, ESQUIRE</p> <p>4 STINSON LLP,</p> <p>5 1201 Walnut Street</p> <p>6 Suite 2900</p> <p>7 Kansas City, MO 64106</p> <p>8 816.842.8600</p> <p>9</p> <p>10 ON BEHALF OF M2 LOANCO LLC,</p> <p>11 ANDREA D'AMBRA, ESQUIRE</p> <p>12 JULIA HARRISON, ESQUIRE</p> <p>13 NORTON ROSE FULBRIGHT</p> <p>14 1301 6th Ave, New York,</p> <p>15 New York 10019</p> <p>16 212.318.3000</p> <p>17 -and-</p> <p>18 AARON KAUFMAN, ESQUIRE</p> <p>19 GRAY REED</p> <p>20 1601 Elm St, Suite 4600,</p> <p>21 Dallas, TX 75201</p> <p>22 214.954.4135</p> <p>23</p> <p>24 Also present: Blake Winchester, Remote Technician</p> <p>25 Ian Cross, Mary Elizabeth Heard</p>	<p>4</p> <p>1 --- Commencing at 10:02 a.m.</p> <p>2 P R O C E E D I N G S</p> <p>3 REMOTE TECHNICIAN: Hello and thank you</p> <p>4 to everyone for attending this proceeding</p> <p>5 remotely, which we anticipate will run smoothly.</p> <p>6 Please remember to speak slowly and do your best</p> <p>7 not to talk over one another and please be aware</p> <p>8 we are recording this proceeding for backup</p> <p>9 purposes. Any off-the-record discussions should</p> <p>10 be had away from the computer, and please remember</p> <p>11 to mute your mic for those conversations.</p> <p>12 Please have your video enabled to help</p> <p>13 the reporter identify who is speaking. If you are</p> <p>14 unable to connect with video and connect via</p> <p>15 phone, please identify yourself each time when</p> <p>16 speaking.</p> <p>17 We will provide a complimentary</p> <p>18 unedited recording of this deposition with the</p> <p>19 purchase of a transcript, and I apologize in</p> <p>20 advance for any technical-related interruptions.</p> <p>21 Thank you.</p> <p>22 (Oath stipulation read and agreed by counsel.)</p> <p>23 ISAAC LEFKOWITZ was sworn and</p> <p>24 testified as follows:</p> <p>25 EXAMINATION</p>

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2 (5 to 8)

5	<p>1 BY MR. ZLUTICKY:</p> <p>2 Q Thank you, Mr. Lefkowitz, my name is</p> <p>3 Nick Zluticky. I'm an attorney representing the</p> <p>4 Official Committee of Unsecured Creditors in the</p> <p>5 bankruptcy case of Tehum Care Services Inc.</p> <p>6 Would you please state your full name</p> <p>7 for the record?</p> <p>8 A Isaac Lefkowitz</p> <p>9 Q Do you have any middle names or</p> <p>10 surnames you use?</p> <p>11 A Yes.</p> <p>12 Q Could you please identify those?</p> <p>13 A Y-I-T-Z-C-H-O-K Y-A-K-O-V.</p> <p>14 Q And is your legal name on your driver's</p> <p>15 license "Isaac Lefkowitz"?</p> <p>16 A No.</p> <p>17 Q What is the name on your driver's</p> <p>18 license?</p> <p>19 A Y-I-T-Z-C-H-O-K.</p> <p>20 Q And what is your current address?</p> <p>21 A 58 C Drive, Fallsburg, New York.</p> <p>22 12733.</p> <p>23 Q So this happens from time to time in</p> <p>24 these depositions, but I didn't hear the first</p> <p>25 part. So, if you could repeat -- and I</p>	7	<p>1 answer verbally, so nodding the head, shaking the</p> <p>2 head, it's difficult for the court reporter to</p> <p>3 grasp and -- and record.</p> <p>4 So, do you understand all of that so</p> <p>5 far?</p> <p>6 A Yes, sir.</p> <p>7 Q And the other thing is I'm going to try</p> <p>8 really hard not to talk over you and I would ask</p> <p>9 that you do the same so that we can have a clean</p> <p>10 record for the court reporter, especially when</p> <p>11 we're doing this virtually. And then the other</p> <p>12 thing is, if you don't understand a question that</p> <p>13 I'm asking, please let me know and I'll do my best</p> <p>14 to rephrase it or explain the question; is that</p> <p>15 fair?</p> <p>16 A Yes.</p> <p>17 Q All right. And so then if you do</p> <p>18 answer a question then I'm going to assume that</p> <p>19 you did understand the question that I asked; is</p> <p>20 that fair?</p> <p>21 A Okay.</p> <p>22 Q Is that fair?</p> <p>23 A "Okay" means yes.</p> <p>24 Q All right. So the first document --</p> <p>25 and you may have this in front of you but if you</p>
6	<p>1 apologize -- part of the address?</p> <p>2 A Which was the first part?</p> <p>3 Q The street number.</p> <p>4 A 58 C Drive.</p> <p>5 Q 58 C Drive, okay. Thank you. And you</p> <p>6 understand that you are here today as the</p> <p>7 designated corporate representative of M2 Loanco</p> <p>8 LLC; is that your understanding?</p> <p>9 A Correct.</p> <p>10 Q Have you ever had your deposition taken</p> <p>11 before?</p> <p>12 A Yes.</p> <p>13 Q About how many times?</p> <p>14 A Can't count.</p> <p>15 Q More than a hundred?</p> <p>16 A In that range.</p> <p>17 Q So we're just going to go through</p> <p>18 a couple of preliminary rules. You've done this</p> <p>19 quite a bit, it sounds like, so you are probably</p> <p>20 familiar with these rules, but the court reporter</p> <p>21 is here, we want a clean record, and so when</p> <p>22 you're answering questions that are "yes" or "no"</p> <p>23 questions, if you could please answer "yes" or</p> <p>24 "no" because "uh-uhs" sound a lot like "ahas" to</p> <p>25 court reporters. And then also if you could</p>	8	<p>1 don't, we can have it pulled up -- is the subpoena</p> <p>2 notice itself.</p> <p>3 Do you have a copy of that at your</p> <p>4 fingertips?</p> <p>5 MS. D'AMBRA: We do. One second. We</p> <p>6 can pull that out and make sure to have all of it.</p> <p>7 BY MR. ZLUTICKY:</p> <p>8 Q So, Lisa and Blake, we're going to mark</p> <p>9 this as Exhibit 1.</p> <p>10 (Exhibit No. 1 was marked for</p> <p>11 identification.)</p> <p>12 REMOTE TECHNICIAN: And can you give me</p> <p>13 the title of that document, counsel?</p> <p>14 MR. ZLUTICKY: It's -- it's the notice</p> <p>15 of service of subpoena to M2 Loanco, LLC. It's</p> <p>16 docket number 535.</p> <p>17 REMOTE TECHNICIAN: Thank you.</p> <p>18 BY MR. ZLUTICKY:</p> <p>19 Q Have you seen this document before,</p> <p>20 Mr. Lefkowitz?</p> <p>21 A Just one second please. Yes, I do.</p> <p>22 Q So this is a subpoena to provide</p> <p>23 testimony on a set list of topics.</p> <p>24 I have previously had discussions with</p> <p>25 M2 Loanco's counsel, what we are doing today is</p>

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3 (9 to 12)

<p style="text-align: right;">9</p> <p>1 we're limiting our discussion to topics.</p> <p>2 If you look on page 9 of the PDF but it</p> <p>3 would be page 4 of the exhibit, it looks -- it</p> <p>4 lists several topics.</p> <p>5 At the top it starts with 5. Do you</p> <p>6 see that?</p> <p>7 A Right.</p> <p>8 Q Okay. So what we've agreed to with</p> <p>9 your counsel is that what we're going to do is</p> <p>10 talk about topics 8, 9, 10, 11, 13, 14, 15, 16 and</p> <p>11 17 today and that we're going to address the rest</p> <p>12 of the topics at a later date.</p> <p>13 So just focusing on those topics today,</p> <p>14 what did you do to prepare yourself for your</p> <p>15 deposition today?</p> <p>16 A Discussed it with counsel.</p> <p>17 Q Did you review any documents to prepare</p> <p>18 for your deposition today?</p> <p>19 A No.</p> <p>20 Q Did you speak to anyone other than your</p> <p>21 counsel to prepare for your deposition today?</p> <p>22 A No.</p> <p>23 Q Did you speak to Alan Rubenstein?</p> <p>24 A No.</p> <p>25 Q Did you review any of your emails --</p>	<p style="text-align: right;">11</p> <p>1 company?</p> <p>2 A Perigrove.</p> <p>3 Q It has -- it's not an LLC; it's not a</p> <p>4 corporation; it's not a partnership; it has no</p> <p>5 other names. It's just one word, "Perigrove?"</p> <p>6 A I believe it's an LLC.</p> <p>7 Q Okay. What's your position at</p> <p>8 Perigrove?</p> <p>9 A I'm a VP.</p> <p>10 Q The vice-president?</p> <p>11 A One of them.</p> <p>12 Q And in your capacity as vice-president</p> <p>13 of Perigrove, you have an email account at</p> <p>14 Perigrove; is that right?</p> <p>15 A Correct.</p> <p>16 Q From that email address have you</p> <p>17 communicated with anyone regarding the business of</p> <p>18 M2 Loanco, LLC?</p> <p>19 A Yes.</p> <p>20 Q Who did you communicate with?</p> <p>21 A I don't have the details in front of</p> <p>22 me.</p> <p>23 Q What do you remember about who you</p> <p>24 spoke with?</p> <p>25 A Business relating to M2 Loanco.</p>
<p style="text-align: right;">10</p> <p>1 A Yes.</p> <p>2 Q -- to prepare for today.</p> <p>3 A Yes.</p> <p>4 Q Okay. So what emails did you review?</p> <p>5 A I handed over my email box to counsel.</p> <p>6 Q So let's drill down on that for a</p> <p>7 moment.</p> <p>8 When you say "my email box," what do</p> <p>9 you mean by "my email box?"</p> <p>10 A Email address has an email intake box.</p> <p>11 Q So you turned over a box that contains</p> <p>12 all of the emails associated with your email</p> <p>13 address; is that correct?</p> <p>14 A No, associated with M2 Loanco.</p> <p>15 Q What email address is that?</p> <p>16 A IL@perigrove.com.</p> <p>17 Q And you said that you turned over that</p> <p>18 box of emails to counsel for M2 Loanco, LLC; is</p> <p>19 that right?</p> <p>20 A Correct.</p> <p>21 Q Who is Perigrove?</p> <p>22 A Who is Perigrove?</p> <p>23 Q Yes, who is Perigrove?</p> <p>24 A Perigrove is a company.</p> <p>25 Q Okay, can -- what's the name of the</p>	<p style="text-align: right;">12</p> <p>1 Q Well, that's the what. I'm asking</p> <p>2 about the who.</p> <p>3 A Who I communicated with?</p> <p>4 Q Correct.</p> <p>5 A I think I testified that I don't have</p> <p>6 it in front of me.</p> <p>7 Q So you're saying, sitting here today,</p> <p>8 you don't remember anyone you communicated with on</p> <p>9 behalf of M2 Loanco?</p> <p>10 A I wouldn't have the details. I handed</p> <p>11 over the entire box.</p> <p>12 Q But sitting here today, you don't</p> <p>13 remember anyone you communicated with on behalf of</p> <p>14 M2 Loanco?</p> <p>15 A You can ask me an individual and it</p> <p>16 will jog my memory.</p> <p>17 Q No, that's not what I was asking.</p> <p>18 I was asking do you remember anyone that you</p> <p>19 communicated with on behalf of M2 Loanco?</p> <p>20 A Sure. I remember communicating with</p> <p>21 counsel.</p> <p>22 Q Who's counsel?</p> <p>23 A There's quite a few.</p> <p>24 Q Okay. Well, let's go through them.</p> <p>25 A Firm of White & Case.</p>

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4 (13 to 16)

<p>1 Q So let's start there. So White & Case 2 was counsel for M2 Loanco? 3 A Correct. 4 Q Is White & Case still counsel for M2 5 Loanco? 6 A No. 7 Q Okay. When did that engagement begin? 8 A Sometime early 2022. 9 Q When did that engagement conclude? 10 A Mid '22. 11 Q When in 2022? 12 A Correct. 13 Q When in 2022? 14 A I don't recall. I said mid year '22. 15 Q And at that point White & Case no 16 longer represented M2 Loanco? 17 A I believe so. 18 Q What other counsel did M2 Loanco have 19 that you communicated with? 20 A We have in-house counsel. 21 Q M2 Loanco has in-house counsel? 22 A Perigrove has in-house counsel. 23 Q Does M2 Loanco have in-house counsel? 24 A No. 25 Q Who's the in-house counsel at Perigrove</p>	13	<p>1 them differently. 2 Q And Alan Rubenstein was with which 3 firm? 4 A He was a -- his own firm called 5 Rubenstein and Horowitz 6 Q Did you communicate with Alan 7 Rubenstein regarding the business of M2 Loanco, 8 LLC? 9 A Yes. 10 Q Any other counsel that M2 Loanco, LLC 11 had? 12 A I wouldn't recall. 13 Q So the only counsel that's ever 14 represented M2 Loanco, LLC other than in this 15 bankruptcy case that you can recall is White 16 & Case, Zalman Shapiro and Alan Rubenstein? 17 A Correct. 18 Q Just to be clear once again, to prepare 19 for today's deposition did you speak with 20 Mr. Rubenstein? 21 A No. 22 Q Did you speak with Mr. Shapiro? 23 A No. 24 Q Did you speak with anyone at White 25 & Case?</p>	15
<p>1 you communicated with? 2 A His name is Zalman Shapiro. 3 Q Okay. Would you please spell that for 4 me? 5 A Z-A-L-M-A-N, S-C-H-A-P-I-R-O. 6 MS. D'AMBRA: Objection. Can we get 7 some clarification on whether or not you're asking 8 if he communicated with Mr. Shapiro with respect 9 to M2 Loanco? 10 BY MR. ZLUTICKY: 11 Q Well, I'm just asking how to spell his 12 name. I mean, I'll get there but I just want to 13 know how to spell his name first. 14 So it's Z-A-L-M-A-N, and it's 15 S-C-H-A-P-I-R-O? 16 A Correct. 17 Q Did you communicate with Mr. Shapiro 18 regarding the business of M2 Loanco, LLC? 19 A I don't recall. 20 Q What other counsel did M2 Loanco, LLC 21 have? 22 A Alan Rubenstein. 23 Q And Rubenstein is spelled 24 R-U-B-E-N-S-T-E-I-N? 25 A I don't know, E-I or I-E. People spell</p>	14	<p>1 A No. 2 Q Did you speak with anyone else at 3 M2 Loanco about what attorneys M2 Loanco had? 4 A No. 5 Q Did you speak with anyone else at 6 M2 Loanco about anything at all to prepare for 7 today? 8 A No. 9 Q Other than speaking with your attorney, 10 which is Norton Rose Fulbright -- is that correct, 11 the attorney for M2 Loanco? 12 A Correct. 13 Q Other than speaking with attorneys at 14 Norton Rose Fulbright -- and I do not want to get 15 into those communications; I'm not asking about 16 that -- but other than those communications did 17 you speak with anyone else to prepare for your 18 deposition today? 19 A No. 20 Q And you said you reviewed no documents 21 to prepare for today? 22 A Correct. 23 Q What's your title at M2 Loanco, LLC? 24 A Director. 25 Q How long have you been a director of</p>	16

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5 (17 to 20)

<p style="text-align: right;">17</p> <p>1 M2 Loanco, LLC?</p> <p>2 A Since December of '21.</p> <p>3 Q Why you did become a director of</p> <p>4 M2 Loanco, LLC?</p> <p>5 A Why?</p> <p>6 Q Why?</p> <p>7 A I don't know why. What does "why"</p> <p>8 mean? I don't know why.</p> <p>9 Q Is it -- did somebody ask you to be</p> <p>10 director? Did you ask to be director of M2</p> <p>11 Loanco?</p> <p>12 A I asked myself to be a director.</p> <p>13 Q Okay. And I assume you agreed?</p> <p>14 A Agree.</p> <p>15 Q In what capacity did you ask yourself</p> <p>16 to be director of M2 Loanco, LLC?</p> <p>17 A The director.</p> <p>18 Q Of which company?</p> <p>19 A Of M2 Holdco.</p> <p>20 Q Let's talk about M2 Loanco's</p> <p>21 organizational structure for a moment.</p> <p>22 Who are the members of M2 Loanco, LLC?</p> <p>23 A M2 Holdco.</p> <p>24 Q M2 Holdco is the member of M2 Loanco,</p> <p>25 LLC; is that correct?</p>	<p style="text-align: right;">19</p> <p>1 than Alan Rubenstein?</p> <p>2 A No.</p> <p>3 Q Is Alan Rubenstein still a director of</p> <p>4 M2 Loanco, LLC?</p> <p>5 A Correct.</p> <p>6 Q Other than Alan Rubenstein and you, are</p> <p>7 there any other directors of M2 Loanco, LLC?</p> <p>8 A I believe the question was asked and</p> <p>9 answered three times, and the answer is "No."</p> <p>10 Q Okay. So I'm going to -- your attorney</p> <p>11 can object to questions, but unless your attorney</p> <p>12 instructs you not to answer them, you are going to</p> <p>13 need to answer them, okay?</p> <p>14 A And I did, for the fourth time.</p> <p>15 Q Does M2 Loanco, LLC have any officers?</p> <p>16 A No.</p> <p>17 Q Since you joined M2 Loanco, LLC as a</p> <p>18 director in December 2021 did M2 Loanco, LLC have</p> <p>19 any officers?</p> <p>20 A No.</p> <p>21 Q So, from December 2021 forward,</p> <p>22 M2 Loanco, LLC is operated with two directors and</p> <p>23 no officers; is that correct?</p> <p>24 A Correct.</p> <p>25 Q Has -- does M2 Loanco, LLC have any</p>
<p style="text-align: right;">18</p> <p>1 A Correct.</p> <p>2 Q Is M2 Loanco a member-managed LLC or</p> <p>3 a manager-managed LLC?</p> <p>4 A I believe a member-managed.</p> <p>5 Q Are there any directors of M2 Loanco,</p> <p>6 LLC other than you?</p> <p>7 A Yes.</p> <p>8 Q Who are they?</p> <p>9 A Alan Rubenstein.</p> <p>10 Q And that's the same Alan Rubenstein of</p> <p>11 Rubenstein and Horowitz?</p> <p>12 A Correct.</p> <p>13 Q Are there any other directors</p> <p>14 M2 Loanco, LLC?</p> <p>15 A No.</p> <p>16 Q Were there any directors of M2 Loanco,</p> <p>17 LLC prior to you becoming a director of M2 Loanco,</p> <p>18 LLC in December of 2021?</p> <p>19 A I don't know.</p> <p>20 Q You don't know if there were any</p> <p>21 directors prior to you becoming a director of</p> <p>22 M2 Loanco, LLC?</p> <p>23 A Correct.</p> <p>24 Q Have there been any directors, since</p> <p>25 you became a director of M2 Loanco, LLC, other</p>	<p style="text-align: right;">20</p> <p>1 employees?</p> <p>2 A No.</p> <p>3 Q Has M2 Loanco, LLC ever had any</p> <p>4 employees?</p> <p>5 A I don't know.</p> <p>6 Q Has M2 Loanco, LLC had any employees</p> <p>7 from and after December 2021?</p> <p>8 A No.</p> <p>9 Q Do you have a position within</p> <p>10 M2 Holdco, LLC?</p> <p>11 A Yes.</p> <p>12 Q What is that position?</p> <p>13 A Director.</p> <p>14 Q When did you become director of</p> <p>15 M2 Holdco, LLC?</p> <p>16 A November of '21.</p> <p>17 Q And was that another situation where</p> <p>18 you asked yourself to be director of M2 Holdco,</p> <p>19 LLC?</p> <p>20 A Correct.</p> <p>21 Q And in what capacity did you ask</p> <p>22 yourself to be director?</p> <p>23 A Director.</p> <p>24 Q Of which entity?</p> <p>25 A Holdco.</p>

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6 (21 to 24)

21	<p>1 Q So -- but you -- you weren't director</p> <p>2 until you were, right? So if you're saying you</p> <p>3 asked yourself to be a director of M2 Holdco and</p> <p>4 you were asking on behalf of another entity, what</p> <p>5 other entity were you asking on behalf of?</p> <p>6 A Perigrove 1018 LLC.</p> <p>7 Q Perigrove 1018 LLC?</p> <p>8 A Correct.</p> <p>9 Q What's the relationship between</p> <p>10 Perigrove 1018 LLC and M2 Holdco, LLC?</p> <p>11 A 100 per cent member.</p> <p>12 Q So Perigrove 1018 LLC is the sole</p> <p>13 member of M2 Holdco, LLC?</p> <p>14 A Correct.</p> <p>15 Q And you are a director of Perigrove</p> <p>16 1018 LLC?</p> <p>17 A Correct.</p> <p>18 Q When did you become director of</p> <p>19 Perigrove 1018 LLC?</p> <p>20 A December of '21.</p> <p>21 Q Okay. And in this very extensive</p> <p>22 conversation that you were having with yourself,</p> <p>23 how is it that you came to be the director of</p> <p>24 Perigrove 1018 LLC?</p> <p>25 A I don't recall.</p>	23
22	<p>1 Q Did you ask yourself to do it again?</p> <p>2 A I believe so.</p> <p>3 Q Okay. And on behalf of what entity did</p> <p>4 you ask yourself?</p> <p>5 A Myself.</p> <p>6 Q So you individually asked you</p> <p>7 individually to be a director of Perigrove 1018</p> <p>8 LLC?</p> <p>9 A Correct.</p> <p>10 Q Okay. And do you have any ownership</p> <p>11 interest in Perigrove 1018 LLC?</p> <p>12 A Yes.</p> <p>13 Q Okay. And what is that interest?</p> <p>14 A 5 percent.</p> <p>15 Q Can you restate your answer, please?</p> <p>16 A 5 percent.</p> <p>17 Q How long have you held a 5 percent</p> <p>18 membership interest in Perigrove 1018 LLC?</p> <p>19 A Since December of '21.</p> <p>20 Q Who are the other members of Perigrove</p> <p>21 1018 LLC?</p> <p>22 A Group of investors.</p> <p>23 Q Who are they?</p> <p>24 A I don't have their names in front of</p> <p>25 me.</p>	24
	<p>1 Q Do you know who they are?</p> <p>2 A A whole group of individual investors.</p> <p>3 Q Okay. Do you remember any of them?</p> <p>4 A I do.</p> <p>5 Q Who?</p> <p>6 A I remember Abe Goldberger.</p> <p>7 Q And how do you spell that?</p> <p>8 A G-O-L-D-B-E-R-G-E-R.</p> <p>9 Q And the first name is Abe?</p> <p>10 A Correct.</p> <p>11 Q Okay. Who else?</p> <p>12 A David Gefner.</p> <p>13 Q And Gefner, is that G-E-F-F-N-E-R?</p> <p>14 A I believe one F.</p> <p>15 Q One. Who else?</p> <p>16 A I don't recall the rest.</p> <p>17 Q Those are the only two members of</p> <p>18 Perigrove 1018 LLC besides you that you can recall</p> <p>19 today?</p> <p>20 A Correct.</p> <p>21 Q Did you ever communicate with Abe</p> <p>22 Goldberger about the business of M2 Loanco, LLC?</p> <p>23 A No.</p> <p>24 Q Not once, ever?</p> <p>25 A Correct.</p>	

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Conducted on May 12, 2023

7 (25 to 28)

<p>25</p> <p>1 Q More than one?</p> <p>2 A Yes.</p> <p>3 Q More than two?</p> <p>4 A Yes.</p> <p>5 Q More than three?</p> <p>6 A Yes.</p> <p>7 Q More than four?</p> <p>8 A Yes.</p> <p>9 Q More than five?</p> <p>10 A Yes.</p> <p>11 Q More than six?</p> <p>12 A Yes.</p> <p>13 Q More than seven?</p> <p>14 A I sit in an office with a lot of phone</p> <p>15 numbers. What are you trying to create a record</p> <p>16 here? I said many numbers. I don't know from</p> <p>17 which number I called.</p> <p>18 Q More than seven?</p> <p>19 A I'm going to stop right here. I don't</p> <p>20 know.</p> <p>21 Q You know it was more than six, but you</p> <p>22 know whether it was more than seven; is that</p> <p>23 correct?</p> <p>24 A No it's not correct.</p> <p>25 Q Okay, well, can you please explain your</p>	<p>27</p> <p>1 Q Can you please spell that?</p> <p>2 A S-P-O-O-K, R-O-C-K.</p> <p>3 Q And is that -- and where is that in New</p> <p>4 York?</p> <p>5 A Suffern, New York.</p> <p>6 Q Is that an office building?</p> <p>7 A Office complex.</p> <p>8 Q And do you have an office there?</p> <p>9 A Yes.</p> <p>10 Q And I'm -- you have an office phone,</p> <p>11 correct?</p> <p>12 A Correct.</p> <p>13 Q And you use that office phone to</p> <p>14 communicate with White & Case regarding business</p> <p>15 of M2 Loanco, LLC?</p> <p>16 A Correct.</p> <p>17 Q And what's that phone number.</p> <p>18 A I said it's a VOIP system. You pick up</p> <p>19 the phone and every time it's a different number.</p> <p>20 Q Every single time it's a different</p> <p>21 number?</p> <p>22 A Correct.</p> <p>23 Q Okay. So never the same number twice?</p> <p>24 A I didn't say.</p> <p>25 Q So if I were receiving a call from you</p>
<p>26</p> <p>1 answer.</p> <p>2 A When you sit in an office and there's a</p> <p>3 lot of phone lines going out, you can't identify</p> <p>4 from which number you make a phone call, but</p> <p>5 I know it's more than six and I know it's more</p> <p>6 than seven. Apparently you're trying to create a</p> <p>7 circus of a record and I'm not going to let it</p> <p>8 happen. It's a lot of phone numbers in the</p> <p>9 office.</p> <p>10 Q Which office?</p> <p>11 A Perigrove.</p> <p>12 Q And is that a physical location?</p> <p>13 A It is.</p> <p>14 Q That has all of these numbers.</p> <p>15 A It's a VOIP system, with a lot of</p> <p>16 numbers.</p> <p>17 Q You said VOIP system. Do you mean</p> <p>18 VOIP, voice over internet protocol; is that what</p> <p>19 you're saying?</p> <p>20 A Correct.</p> <p>21 Q Where's the physical office location of</p> <p>22 Perigrove?</p> <p>23 A Suffern, New York.</p> <p>24 Q Do you know the address?</p> <p>25 A 51 Spook Rock.</p>	<p>28</p> <p>1 at the -- at your office in Perigrove and you were</p> <p>2 using your office line there would be no way for</p> <p>3 me to know that you were calling me from</p> <p>4 a Perigrove line?</p> <p>5 A Would be, it would come up Perigrove</p> <p>6 but it's not always the same line.</p> <p>7 Q How many office phones did you have --</p> <p>8 do you have at your office in Perigrove?</p> <p>9 MS. D'AMBRA: Objection, asked and</p> <p>10 answered.</p> <p>11 BY MR. ZLUTICKY:</p> <p>12 Q I mean you can object to form but if</p> <p>13 you'd like to instruct the witness not to answer,</p> <p>14 you can do that but I believe your two options are</p> <p>15 to object to form or to object and instruct the</p> <p>16 witness not to answer.</p> <p>17 MS. D'AMBRA: You can answer.</p> <p>18 THE WITNESS: A VOIP phone is virtual,</p> <p>19 wherever you go, so it's not just in the office.</p> <p>20 It's everywhere.</p> <p>21 BY MR. ZLUTICKY:</p> <p>22 Q Did also you also communicate with</p> <p>23 White & Case regarding the business of M2 Loanco,</p> <p>24 LLC using another phone?</p> <p>25 A I don't recall.</p>

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Transcript of Isaac Lefkowitz, Designated Representative
Conducted on May 12, 2023

8 (29 to 32)

<p style="text-align: right;">29</p> <p>1 Q Do you have a cell phone?</p> <p>2 A Yes.</p> <p>3 Q How many cell phones do you have?</p> <p>4 A Quite a few.</p> <p>5 Q You personally have quite a few cell</p> <p>6 phones?</p> <p>7 A Correct.</p> <p>8 Q Okay. And do each of these cell phones</p> <p>9 have different numbers?</p> <p>10 A Yes.</p> <p>11 Q Would you use your cell phones to</p> <p>12 communicate to White & Case on behalf of</p> <p>13 M2 Loanco, LLC?</p> <p>14 A I don't recall.</p> <p>15 Q Did you look at any of your phone</p> <p>16 records in preparation for your deposition today?</p> <p>17 A No.</p> <p>18 Q Other than your office phone at</p> <p>19 Perigrove and your many cell phones you have, did</p> <p>20 you use any other phone to communicate with White</p> <p>21 & Case regarding the business of M2 Loanco, LLC?</p> <p>22 A I don't recall.</p> <p>23 Q Do you use other phone numbers to</p> <p>24 communicate regarding business other than the</p> <p>25 Perigrove office phone, which is a VOIP system,</p>	<p style="text-align: right;">30</p> <p>1 and your cell phone?</p> <p>2 A Not that I'm aware of.</p> <p>3 Q Do you have a home phone line?</p> <p>4 A Yes.</p> <p>5 Q Do you use your home phone line to</p> <p>6 communicate regarding business?</p> <p>7 A I don't use my home phone line at all.</p> <p>8 Q Is there any other location where you</p> <p>9 would conduct business on behalf of M2 Loanco, LLC</p> <p>10 other than the Perigrove office in Suffern?</p> <p>11 A Virtual.</p> <p>12 Q "Virtual" meaning you would log in</p> <p>13 remotely from wherever you happen to be?</p> <p>14 A Correct.</p> <p>15 Q Do you have any other physical office</p> <p>16 that you use to conduct business on behalf of</p> <p>17 M2 Loanco, LLC other than the office of Perigrove</p> <p>18 in Suffern?</p> <p>19 A No.</p> <p>20 Q Do you have a home office?</p> <p>21 A Yes.</p> <p>22 Q Do you conduct business out of your</p> <p>23 home office?</p> <p>24 A I try not to.</p> <p>25 Q Are you successful?</p>	<p style="text-align: right;">31</p> <p>1 A That's a question you need to ask my</p> <p>2 family.</p> <p>3 Q Well, I know that you say you try not</p> <p>4 to but do you conduct business out of your home</p> <p>5 office?</p> <p>6 A Correct.</p> <p>7 REMOTE TECHNICIAN: Counsel, could we</p> <p>8 possibly move the microphone closer to the witness</p> <p>9 just to make sure our court reporter can hear --</p> <p>10 MS. D'AMBRA: Unfortunately we can't.</p> <p>11 MR. KAUFMAN: They're all glued down.</p> <p>12 REMOTE TECHNICIAN: Okay. Just -- the</p> <p>13 voice is trailing off for the answers a lot.</p> <p>14 I just want to make sure we're able to get a clear</p> <p>15 record.</p> <p>16 THE WITNESS: I'll try to speak loud</p> <p>17 louder.</p> <p>18 BY MR. ZLUTICKY:</p> <p>19 Q Feel free to yell any time.</p> <p>20 So did you ever communicate with White</p> <p>21 & Case in person regarding the business of</p> <p>22 M2 Loanco, LLC?</p> <p>23 A I don't recall.</p> <p>24 Q So we've gone over the use of phone so</p> <p>25 now let's talk about text messages. Did you send</p>	<p style="text-align: right;">32</p> <p>1 any text messages to White & Case regarding the</p> <p>2 business of M2 Loanco, LLC?</p> <p>3 A Not that I recall.</p> <p>4 Q Do you use any messaging system besides</p> <p>5 standard text messages to communicate regarding</p> <p>6 the business of M2 Loanco, LLC?</p> <p>7 A Not that I believe so.</p> <p>8 Q Do you have a Signal account?</p> <p>9 A I do.</p> <p>10 Q Do you use that Signal account to</p> <p>11 conduct business of M2 Loanco, LLC?</p> <p>12 A No.</p> <p>13 Q You -- you recall that you don't do</p> <p>14 that; is that correct?</p> <p>15 A Use it rarely, occasionally, for</p> <p>16 personal.</p> <p>17 Q And you use it for personal use?</p> <p>18 A Yes.</p> <p>19 Q But not for business; correct?</p> <p>20 A Correct.</p> <p>21 Q Do you have a WhatsApp account?</p> <p>22 A Yes.</p> <p>23 Q Do you use your WhatsApp account to</p> <p>24 conduct business on behalf of M2 Loanco, LLC?</p> <p>25 A I don't recall that.</p>
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Transcript of Isaac Lefkowitz, Designated Representative
Conducted on May 12, 2023

9 (33 to 36)

<p style="text-align: right;">33</p> <p>1 Q Do you use your WhatsApp account to</p> <p>2 conduct business at all?</p> <p>3 A Yes.</p> <p>4 Q You just don't recall whether it was</p> <p>5 for M2 Loanco, LLC?</p> <p>6 A Correct.</p> <p>7 Q Did you look at your WhatsApp account</p> <p>8 in preparation for your deposition today?</p> <p>9 A Yes.</p> <p>10 Q And did you find any communications</p> <p>11 regarding M2 Loanco, LLC?</p> <p>12 A No.</p> <p>13 Q So I'm confused. You said you didn't</p> <p>14 review any documents, so you would consider the</p> <p>15 reviewing of your WhatsApp account something other</p> <p>16 than a review of documents; it's a review of</p> <p>17 information, is that right?</p> <p>18 A Devise.</p> <p>19 Q Okay. So that's helpful. What devices</p> <p>20 did you review to prepare for your deposition</p> <p>21 today?</p> <p>22 A My computer where my mailbox is, my</p> <p>23 phone.</p> <p>24 Q Okay. So which phone is that because</p> <p>25 you said you have multiple cell phones?</p>	<p style="text-align: right;">35</p> <p>1 A No.</p> <p>2 Q Instagram?</p> <p>3 A No.</p> <p>4 Q So the only messaging program you use</p> <p>5 is Whatsapp, Signal and standard text messages?</p> <p>6 A Right.</p> <p>7 Q Do you have multiple Signal accounts?</p> <p>8 A No.</p> <p>9 Q Now let's talk about emails. You have</p> <p>10 an email address of IL@perigrove.com; is that</p> <p>11 correct?</p> <p>12 A Correct.</p> <p>13 Q And that's the email account that you</p> <p>14 turned over to counsel for M2 Loanco, LLC?</p> <p>15 A Correct.</p> <p>16 Q Do you have any other email accounts at</p> <p>17 Perigrove?</p> <p>18 A No.</p> <p>19 Q Do you have any other email accounts at</p> <p>20 M2 Holdco, LLC?</p> <p>21 A No.</p> <p>22 Q Do you have any other email accounts</p> <p>23 at all?</p> <p>24 A Yes.</p> <p>25 Q Do you conduct business using those</p>
<p style="text-align: right;">34</p> <p>1 A I looked at multiple.</p> <p>2 Q You looked at multiple cell phones in</p> <p>3 preparation for your deposition today?</p> <p>4 A Not in preparation, just to see if</p> <p>5 there's any WhatsApp messages of M2 Loanco.</p> <p>6 Q Okay. So do you have multiple WhatsApp</p> <p>7 accounts?</p> <p>8 A Yes.</p> <p>9 Q And do you use any of those WhatsApp</p> <p>10 accounts to conduct business on behalf of</p> <p>11 M2 Loanco, LLC?</p> <p>12 A No.</p> <p>13 Q But earlier you said you didn't recall</p> <p>14 whether you used WhatsApp to conduct business on</p> <p>15 behalf of M2 Loanco, LLC, so it no or is it that</p> <p>16 you don't recall?</p> <p>17 A I can say a certain no, I don't recall.</p> <p>18 I searched and I didn't find any.</p> <p>19 Q Do you use any other messaging programs</p> <p>20 similar to Signal or WhatsApp?</p> <p>21 A No.</p> <p>22 Q Do you use Telegram?</p> <p>23 A No.</p> <p>24 Q Do you use any social media messaging</p> <p>25 app?</p>	<p style="text-align: right;">36</p> <p>1 other email accounts?</p> <p>2 A Other business?</p> <p>3 MR. KAUFMAN: Nick, can you clarify,</p> <p>4 business in what capacity? Eric Kaufman for the</p> <p>5 debtor. I just want to clarify. The question</p> <p>6 was: Do you conduct -- as I heard it, the question</p> <p>7 was asking about conducting business and I just</p> <p>8 wanted a little clarification about which</p> <p>9 businesses.</p> <p>10 BY MR. ZLUTICKY:</p> <p>11 Q Yeah, I'm talking in general. Do you</p> <p>12 conduct any business out of those other email</p> <p>13 accounts?</p> <p>14 MR. KAUFMAN: Object to form.</p> <p>15 THE WITNESS: Yes.</p> <p>16 MS. D'AMBRA: I will remind the witness</p> <p>17 that he's here testifying on behalf of M2 Loanco.</p> <p>18 BY MR. ZLUTICKY:</p> <p>19 Q Okay. Thank you for the reminder.</p> <p>20 Do you -- have you ever used any other</p> <p>21 email accounts to conduct business on behalf of</p> <p>22 M2 Loanco, LLC?</p> <p>23 A No.</p> <p>24 Q And how do you know that?</p> <p>25 A I know I used Perigrove.</p>

Transcript of Isaac Lefkowitz, Designated Representative
Conducted on May 12, 2023

10 (37 to 40)

<p style="text-align: right;">37</p> <p>1 Q So you never used any other email</p> <p>2 account to conduct business on behalf of</p> <p>3 M2 Loanco, LLC?</p> <p>4 A What does "conduct business" mean?</p> <p>5 Q I didn't hear that answer, I'm sorry.</p> <p>6 A What does "conduct business" mean?</p> <p>7 Q Did you ever communicate with anyone</p> <p>8 about M2 Loanco, LLC using an email address other</p> <p>9 than IL@perigrove.com?</p> <p>10 A I don't recall. I recall using</p> <p>11 IL Perigrove.</p> <p>12 Q But you don't recall using others?</p> <p>13 A Correct.</p> <p>14 Q But you don't know one way or another</p> <p>15 whether you used others?</p> <p>16 A Correct.</p> <p>17 Q Okay. So what are those other email</p> <p>18 addresses?</p> <p>19 A I have a dozen email addresses.</p> <p>20 Q Well, can you get a list and please</p> <p>21 provide them to counsel and, counsel, I'm</p> <p>22 requesting a list of those addresses.</p> <p>23 MS. D'AMBRA: Understood.</p> <p>24 BY MR. ZLUTICKY:</p> <p>25 Q Now we've -- we've discussed the</p>	<p style="text-align: right;">38</p> <p>1 methods of communication, I want to move from</p> <p>2 White & Case to Zalman Shapiro. When you</p> <p>3 communicated with Zalman Shapiro regarding the</p> <p>4 business of M2 Loanco, LLC, how would you do it?</p> <p>5 A Mainly by phone.</p> <p>6 Q I'm sorry, I didn't hear that answer.</p> <p>7 A Mainly by phone.</p> <p>8 Q Okay. And would that be the Perigrove</p> <p>9 phone?</p> <p>10 A (Inaudible) phone.</p> <p>11 MR. ZLUTICKY: Yeah, I don't know how</p> <p>12 to -- I think that's a technical issue.</p> <p>13 MS. D'AMBRA: We're going to see if we</p> <p>14 can get another microphone in here. I'm not sure</p> <p>15 we can but we'll try.</p> <p>16 BY MR. ZLUTICKY:</p> <p>17 Q So, Mr. Lefkowitz, you said that you</p> <p>18 would communicate with Zalman Shapiro regarding</p> <p>19 the business of M2 Loanco, LLC by phone; is that</p> <p>20 correct?</p> <p>21 A Correct. Okay. Correct.</p> <p>22 Q And what phone number would you use</p> <p>23 other than the Perigrove office line that is the</p> <p>24 VOIP line?</p> <p>25 A I wouldn't recall.</p>
	<p style="text-align: right;">39</p> <p>1 Q But we've already established that you</p> <p>2 conduct -- you would only conduct business using</p> <p>3 the Perigrove phone or one of your cell phones,</p> <p>4 correct?</p> <p>5 A No, that's not correct.</p> <p>6 Q Okay. Can you tell me what other ways</p> <p>7 you would communicate by phone?</p> <p>8 A Grab a phone and call. I don't recall</p> <p>9 which phone I called from.</p> <p>10 Q Okay. Most payphones in New York are</p> <p>11 gone now, as I understand it, so how -- what phone</p> <p>12 would you use?</p> <p>13 A There's other phones other than</p> <p>14 payphones in New York.</p> <p>15 Q Okay. So give me an example.</p> <p>16 A Hotel room.</p> <p>17 Q So you would use a hotel room telephone</p> <p>18 to communicate with Mr. Shapiro?</p> <p>19 A I said I don't recall, but not</p> <p>20 necessarily just the VOIP phone and cell phone.</p> <p>21 It could be any phone that I need to pick up and</p> <p>22 make a phone call.</p> <p>23 Q But in terms of what you recall --</p> <p>24 A I don't recall.</p> <p>25 Q You don't recall ever having a</p>
	<p style="text-align: right;">40</p> <p>1 telephone conversation with Mr. Shapiro regarding</p> <p>2 M2 Loanco?</p> <p>3 A I recall. I don't recall from which</p> <p>4 phone.</p> <p>5 Q So I know you had several cell phones</p> <p>6 that you use, so I'm going to ask for a list of</p> <p>7 those cell phone numbers, if you could provide</p> <p>8 that to counsel.</p> <p>9 Counsel, I'm requesting those as well.</p> <p>10 MS. D'AMBRA: Understood.</p> <p>11 BY MR. ZLUTICKY:</p> <p>12 Q Did you ever communicate with</p> <p>13 Mr. Shapiro regarding M2 Loanco business using</p> <p>14 text messages?</p> <p>15 A I don't recall.</p> <p>16 Q Did you communicate with Mr. Shapiro</p> <p>17 regarding M2 Loanco business in person?</p> <p>18 A Yes.</p> <p>19 Q Where would those meetings take place?</p> <p>20 A In the office.</p> <p>21 Q When you say "the office," what office</p> <p>22 are you talking about?</p> <p>23 A Spook Rock.</p> <p>24 Q That's the office in Suffern, New York?</p> <p>25 A Correct.</p>

Transcript of Isaac Lefkowitz, Designated Representative
Conducted on May 12, 2023

11 (41 to 44)

41	<p>1 Q Are the there any other locations where</p> <p>2 you would meet with Mr. Shapiro to discuss</p> <p>3 business of M2 Loanco?</p> <p>4 A I don't recall.</p> <p>5 Q When you -- did you communicate with</p> <p>6 Mr. Shapiro by email about the business of M2</p> <p>7 Loanco?</p> <p>8 A I don't recall.</p> <p>9 Q And so you wouldn't recall which email</p> <p>10 addresses since you don't recall whether you did</p> <p>11 or not; is that correct?</p> <p>12 A Did you say Gmail addresses? Where did</p> <p>13 that come from?</p> <p>14 MR. ZLUTICKY: Email.</p> <p>15 MS. D'AMBRA: Email.</p> <p>16 THE WITNESS: Oh, email. I thought you</p> <p>17 said Gmail.</p> <p>18 BY MR. ZLUTICKY:</p> <p>19 Q Do you have a Gmail address?</p> <p>20 A Yes.</p> <p>21 Q Okay. Do you use it to conduct</p> <p>22 business?</p> <p>23 MR. KAUFMAN: Object to form.</p> <p>24 THE WITNESS: Not M2 Loanco business.</p> <p>25 BY MR. ZLUTICKY:</p>	43
42	<p>1 Q Are there any other methods you would</p> <p>2 use to communicate with Mr. Shapiro regarding M2</p> <p>3 Loanco business?</p> <p>4 A No.</p> <p>5 Q Not Signal?</p> <p>6 A No.</p> <p>7 Q Or WhatsApp?</p> <p>8 A I don't believe so.</p> <p>9 Q Facsimile?</p> <p>10 A I don't know what that is, even.</p> <p>11 MS. D'AMBRA: (Laughter).</p> <p>12 BY MR. ZLUTICKY:</p> <p>13 Q Written letter?</p> <p>14 A No.</p> <p>15 Q All right. Did you have telephone</p> <p>16 conversations with Alan Rubenstein regarding the</p> <p>17 business of M2 Loanco, LLC?</p> <p>18 A Yes.</p> <p>19 Q What telephone did you use to have the</p> <p>20 communications with Mr. Rubenstein regarding the</p> <p>21 business of M2 Loanco, LLC?</p> <p>22 A It's the same answer applies what</p> <p>23 I answered on Shapiro and White & Case.</p> <p>24 Q Did you ever meet with Alan Rubenstein</p> <p>25 in person to discuss the business of M2 Loanco,</p>	44
	<p>1 LLC?</p> <p>2 A Yes.</p> <p>3 Q Where did you meet with Mr. Rubenstein</p> <p>4 to discuss the business of M2 Loanco, LLC?</p> <p>5 A His office.</p> <p>6 Q "His office", you mean the office of</p> <p>7 Rubenstein and Horowitz?</p> <p>8 A Correct.</p> <p>9 Q Do you know where that office is</p> <p>10 located?</p> <p>11 A I believe it's in Great Neck, Long</p> <p>12 Island.</p> <p>13 Q Did you ever meet with Mr. Rubenstein</p> <p>14 at the Perigrove office to discuss the business of</p> <p>15 M2 Loanco, LLC?</p> <p>16 A Most likely.</p> <p>17 Q Did you ever meet with Mr. Rubenstein</p> <p>18 anywhere else to discuss the business of M2</p> <p>19 Loanco, LLC?</p> <p>20 A I don't recall.</p> <p>21 Q Did you ever communicate with</p> <p>22 Mr. Rubenstein by text message regarding the</p> <p>23 business of M2 Loanco, LLC?</p> <p>24 A I don't believe so.</p> <p>25 Q Did you ever communicate with</p>	

Transcript of Isaac Lefkowitz, Designated Representative
Conducted on May 12, 2023

12 (45 to 48)

<p>45</p> <p>1 A Oh, now you're talking. Preparation 2 for today's conversation, I did ask him, correct. 3 Q Hold on. Let me finish my question. 4 In preparation for today's deposition, 5 did you talk to Alan Rubenstein? 6 A Yes. 7 Q When did you talk to Alan Rubenstein? 8 A Last week. 9 Q Did you discuss Alan Rubenstein's 10 communications on behalf of M2 Loanco, LLC? 11 A Correct. 12 Q What did he tell you? 13 MS. D'AMBRA: If it's not privileged. 14 MR. ZLUTICKY: I'm solely talking about 15 Alan Rubenstein as a director of M2 Loanco, LLC; 16 it's not privileged. 17 THE WITNESS: I asked him if he has any 18 unprivileged communication, and he said he has 19 none. 20 BY MR. ZLUTICKY: 21 Q That's all you asked him? 22 A Correct. 23 Q Did Alan Rubenstein communicate by 24 email on behalf of M2 Loanco, LLC? 25 A I don't know.</p>	<p>47</p> <p>1 That is not outside the scope; it is 2 directly within the scope. So I'm going to 3 continue to ask the questions about 4 Mr. Rubenstein's communications and get on the 5 record that your witness failed to prepare for 6 this deposition. 7 THE WITNESS: The witness did not fail 8 to prepare for the deposition. The witness did 9 communicate with Mr. Rubenstein. 10 But your question was: does 11 Mr. Rubenstein communicate with other people and 12 how? And how would I know that? I am not 13 Mr. Rubenstein's babysitter. 14 MR. ZLUTICKY: Lisa, could you please 15 read back the question. 16 (Court reporter read back question). 17 THE WITNESS: Waiting for an answer, 18 Nick? 19 BY MR. ZLUTICKY: 20 Q I am. 21 A And how would I know? 22 Q Well, that's a question. I would 23 prefer an answer. 24 A I'm answering you with a question. How 25 would I know if Mr. Rubenstein ever had</p>
<p>46</p> <p>1 Q You don't know if he ever did? 2 A Correct. 3 Q Okay. So would Alan Rubenstein ever 4 conduct business on behalf of M2 Loanco, LLC 5 without your direct involvement? 6 A No. 7 Q So would Alan Rubenstein ever have 8 a communication with anyone about M2 Loanco, LLC 9 that you weren't a part of? 10 MS. D'AMBRA: Objection. 11 THE WITNESS: I wouldn't know. 12 BY MR. ZLUTICKY: 13 Q Are you objecting to form or what? 14 MS. D'AMBRA: I'm objecting to scope. 15 He's not -- he's not Mr. Rubenstein. He can't 16 testify as to what Mr. Rubenstein does or does not 17 do. 18 MR. ZLUTICKY: That is absolutely not 19 correct. This is a 30(b)(6) deposition. He's 20 required to prepare for the deposition and the 21 topics set forth in the deposition which include 22 how the company communicates, that includes 23 Mr. Rubenstein as a director. If he fails to do 24 that, that is a failure of your witness to prepare 25 for a 30(b)(6) deposition.</p>	<p>48</p> <p>1 a communication without me being part of? Isn't 2 that a trick question? 3 Q No, I'm not trying to trick anybody. 4 I'm asking what you -- 5 A You are trying to trick because you 6 asked me, did Mr. Rubenstein conduct business 7 directly without me being part of, and I said 8 I don't believe so. Now you ask a second 9 question, did Mr. Rubenstein ask or spoke to 10 anyone about M2 Loanco without me being part of. 11 In order for me to know that, I would have to be 12 a Siamese twin to him. 13 Q Mr. Lefkowitz, I promise this will go 14 a lot quicker if you would just answer the 15 question that you are asked. 16 A I promise it will go a lot quicker if 17 you ask a precise question. We'll get a precise 18 answer like you got all the precise answers to 19 your precise questions. 20 MR. ZLUTICKY: Lisa, can you please 21 read the question back again. 22 (Court reporter read back question). 23 A I don't know. 24 BY MR. ZLUTICKY: 25 Q Let's take about the methods that Alan</p>

Transcript of Isaac Lefkowitz, Designated Representative
Conducted on May 12, 2023

13 (49 to 52)

<p>49</p> <p>1 Rubenstein -- I'm sorry, is it "Rubenstein" or</p> <p>2 "Rubenstine"?</p> <p>3 A I'm sure he won't be offended if you</p> <p>4 call him "Stine", "Steen", "Stan."</p> <p>5 Q Understood, but as somebody who has a</p> <p>6 last name that is very difficult to pronounce, I</p> <p>7 want to be cognizant of that.</p> <p>8 So, Mr. Rubenstein, I want to talk about</p> <p>9 the methods that he would use to communicate on</p> <p>10 behalf of M2 Loanco, LLC as the director.</p> <p>11 Would Alan Rubenstein communicate as a</p> <p>12 director of M2 Loanco by email?</p> <p>13 A Very rarely. Most of the business is</p> <p>14 done by phone.</p> <p>15 Q What email address would Alan</p> <p>16 Rubenstein use to conduct business on behalf of</p> <p>17 M2 Loanco?</p> <p>18 A Law firm email.</p> <p>19 Q What is that email address?</p> <p>20 A I don't recall it.</p> <p>21 Q Other than his law firm email address,</p> <p>22 would Alan Rubenstein use any other email</p> <p>23 addresses to conduct business on behalf of</p> <p>24 M2 Loanco, LLC?</p> <p>25 A Not that I know of.</p>	<p>51</p> <p>1 A Probably.</p> <p>2 Q Do you recall whether you've received a</p> <p>3 text message from Alan Rubenstein regarding M2</p> <p>4 Loanco?</p> <p>5 A No.</p> <p>6 Q No, you don't recall?</p> <p>7 A Correct.</p> <p>8 Q Did Alan Rubenstein use any other</p> <p>9 messaging systems or applications like WhatsApp or</p> <p>10 Signal to send communications regarding the</p> <p>11 business of M2 Loanco, LLC?</p> <p>12 A Communicate WhatsApp but there's</p> <p>13 nothing about M2 Loanco.</p> <p>14 Q So Alan Rubenstein has a WhatsApp</p> <p>15 account; is that correct?</p> <p>16 A Correct.</p> <p>17 Q And he would communicate with you via</p> <p>18 the WhatsApp account?</p> <p>19 A Short messages, "I'm here," "I'm</p> <p>20 coming," "I'm late."</p> <p>21 Q But do you know whether he would use</p> <p>22 the WhatsApp account to communicate about the</p> <p>23 business of M2 Loanco, LLC?</p> <p>24 A Asked and he said no.</p> <p>25 Q You asked Alan Rubenstein if he used</p>
<p>50</p> <p>1 Q Did you ask him?</p> <p>2 A No.</p> <p>3 Q Did Alan Rubenstein use the telephone</p> <p>4 to communicate about the business of M2 Loanco,</p> <p>5 LLC?</p> <p>6 A Yes.</p> <p>7 Q Okay. Do you know what phone he used?</p> <p>8 A No.</p> <p>9 Q And that's because you didn't ask him?</p> <p>10 A Correct.</p> <p>11 Q Did Alan Rubenstein ever send text</p> <p>12 messages about the business of M2 Loanco, LLC?</p> <p>13 A I don't believe so.</p> <p>14 Q Did you ask him?</p> <p>15 A Yes.</p> <p>16 Q You did ask him about text messages but</p> <p>17 not phone calls?</p> <p>18 A Correct.</p> <p>19 Q Okay. And what did he tell you?</p> <p>20 A He said he has none.</p> <p>21 Q Did he say he never used text message</p> <p>22 or just that he has none?</p> <p>23 A I don't recall the exact answer.</p> <p>24 Q Okay. Have you ever gotten a text</p> <p>25 message from Alan Rubenstein?</p>	<p>52</p> <p>1 WhatsApp and he said no?</p> <p>2 A I asked him if he has any messages or</p> <p>3 records on M2 Loanco on his WhatsApp and he said</p> <p>4 no.</p> <p>5 Q Did you ask Mr. Rubenstein about any</p> <p>6 other messaging systems?</p> <p>7 A No.</p> <p>8 Q So you just asked him about text</p> <p>9 messages and WhatsApp; is that correct?</p> <p>10 A Correct.</p> <p>11 Q Do you know whether Alan Rubenstein</p> <p>12 uses any other messaging systems?</p> <p>13 A I don't.</p> <p>14 Q Did you ask him?</p> <p>15 A No.</p> <p>16 Q Does Alan Rubenstein use any email</p> <p>17 addresses other than his firm email address?</p> <p>18 A I don't know.</p> <p>19 Q And if I already asked this, I</p> <p>20 apologize, I didn't write it down. When did Alan</p> <p>21 Rubenstein become a director of M2 Loanco, LLC?</p> <p>22 A I believe sometime in '22.</p> <p>23 Q Did you ask Alan Rubenstein to be</p> <p>24 a director of M2 Loanco, LLC?</p> <p>25 A Yes.</p>

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Conducted on May 12, 2023

14 (53 to 56)

<p>53</p> <p>1 Q Why?</p> <p>2 A Carry the load.</p> <p>3 Q What load?</p> <p>4 A M2 Loanco.</p> <p>5 Q So what was the load of M2 Loanco that</p> <p>6 you needed help carrying?</p> <p>7 A Monitoring the loan.</p> <p>8 Q When you say "the loan," what do you</p> <p>9 mean?</p> <p>10 A Several loans that M2 Loanco is</p> <p>11 holding.</p> <p>12 Q And the borrower or borrowers under</p> <p>13 those loans, are those -- did those include what</p> <p>14 is now known as Tehum Care Services, Inc?</p> <p>15 A Correct.</p> <p>16 Q And that's a loan where M2 Loanco is</p> <p>17 the lender?</p> <p>18 A Correct.</p> <p>19 Q How would you -- how would M2 Loanco,</p> <p>20 LLC communicate with Tehum Care Services, Inc</p> <p>21 about the loan or loans?</p> <p>22 A By phone.</p> <p>23 Q Who is the person at Tehum Care</p> <p>24 Services, Inc that you would communicate with</p> <p>25 about the M2 Loanco loans?</p>	<p>55</p> <p>1 regarding the M2 Loanco loans?</p> <p>2 A White & Case.</p> <p>3 Q Did White & Case represent Tehum Care</p> <p>4 Services, Inc?</p> <p>5 A I'm not sure. I did have conversation</p> <p>6 with White & Case about it.</p> <p>7 Q Did you have any conversations with</p> <p>8 White & Case after their engagement by M2 Loanco</p> <p>9 ended in midyear of 2022 about the M2 Loanco</p> <p>10 loans?</p> <p>11 A Yes.</p> <p>12 Q Okay. And so because White & Case</p> <p>13 wasn't representing M2 Loanco at that time, who</p> <p>14 was White & Case representing?</p> <p>15 A I don't recall who were they</p> <p>16 representing but it was post transaction that we</p> <p>17 had communications with.</p> <p>18 Q Is there anyone else you had</p> <p>19 communications with about the M2 Loanco loans made</p> <p>20 to Tehum Care Services, Inc besides White & Case,</p> <p>21 Gray Reed and Mr. Perry?</p> <p>22 A Mr. Rubenstein and Mr. Shapiro.</p> <p>23 Q Anyone else?</p> <p>24 A I don't recall.</p> <p>25 Q Did you ever have communications with</p>
<p>54</p> <p>1 A Tehum's counsel.</p> <p>2 Q I'm sorry, I didn't catch that.</p> <p>3 A Counsel, Tehum -- Tehum's attorneys.</p> <p>4 Q And who are those?</p> <p>5 A Norton.</p> <p>6 Q Okay. So what I'm asking is how you</p> <p>7 would communicate with the borrowers which include</p> <p>8 Tehum Care Services, Inc?</p> <p>9 A I am the sole director of Tehum.</p> <p>10 Q Is there anyone at Tehum Care Services,</p> <p>11 Inc would communicate with other than yourself</p> <p>12 about the M2 Loanco loans?</p> <p>13 A Our chief restructuring officer.</p> <p>14 Q And who's that?</p> <p>15 A Russell Perry from Ankura.</p> <p>16 Q Prior to Russell Perry's engagement as</p> <p>17 chief restructuring officer, is there anyone else</p> <p>18 that you would communicate with about the loans</p> <p>19 made by M2 Loanco to Tehum Care Services, Inc?</p> <p>20 A Tehum's counsel.</p> <p>21 Q And who's that?</p> <p>22 A Gray Reed.</p> <p>23 Q Okay. Prior to Gray Reed's engagement</p> <p>24 as counsel for Tehum Care Services, Inc, who would</p> <p>25 you communicate with at Tehum Care Services, Inc</p>	<p>56</p> <p>1 an accountant about the M2 Loanco loans to Tehum</p> <p>2 Care Services, Inc?</p> <p>3 A I don't recall.</p> <p>4 Q Does M2 Loanco, LLC have financial</p> <p>5 statements?</p> <p>6 A I believe so.</p> <p>7 Q Okay. Who prepared these financial</p> <p>8 statements?</p> <p>9 A Accountant.</p> <p>10 Q Who's the accountant?</p> <p>11 A I don't recall the name of the firm.</p> <p>12 Q Do you recall the name of the</p> <p>13 accountant?</p> <p>14 A No.</p> <p>15 Q You just know an accountant.</p> <p>16 A Right.</p> <p>17 Q You just know an accountant did it?</p> <p>18 A Right.</p> <p>19 Q But you don't know who?</p> <p>20 A I don't recall which accountant. But</p> <p>21 if you leave it blank, we'll provide it to you.</p> <p>22 Q Did M2 Loanco use multiple accountants</p> <p>23 to conduct its accounting?</p> <p>24 A Oh, M2 Loanco does not, but the parent</p> <p>25 company does.</p>

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Conducted on May 12, 2023

15 (57 to 60)

57	<p>1 Q By "the parent company", do you mean</p> <p>2 M2 Holdco, LLC?</p> <p>3 A Correct.</p> <p>4 Q And did M2 Holdco, LLC directly engage</p> <p>5 accountants or were those accountants in --</p> <p>6 A Mm-hmm.</p> <p>7 Q Okay. You said "Yes?"</p> <p>8 A Correct.</p> <p>9 Q And who would get copies of the</p> <p>10 M2 Loanco, LLC financials?</p> <p>11 A I do.</p> <p>12 Q Anyone else?</p> <p>13 A I don't know.</p> <p>14 Q Would you provide them to anyone else?</p> <p>15 A Counsel.</p> <p>16 Q And who's "counsel" in that sentence?</p> <p>17 A Norton.</p> <p>18 Q Prior to Norton Rose Fulbright's</p> <p>19 engagement, who would you provide them to?</p> <p>20 A Mr. Rubenstein, Mr. Shapiro.</p> <p>21 Q Would you do that by email?</p> <p>22 A Either email or hard copy.</p> <p>23 Q If they were hard copy, would you</p> <p>24 deliver those copies?</p> <p>25 A In the office.</p>	59	<p>1 about those electronic records. How would M2</p> <p>2 Loanco, LLC maintain its electronic records?</p> <p>3 A The email server.</p> <p>4 Q What email server?</p> <p>5 A IL@perigrove.</p> <p>6 Q Other than IL@perigrove.com, where</p> <p>7 would the M2 Loanco internal records be?</p> <p>8 A IL@perigrove.</p> <p>9 Q So, if M2 -- so M2 Loanco has financial</p> <p>10 statements; correct?</p> <p>11 A Correct.</p> <p>12 Q By those are only available on your</p> <p>13 email account at Perigrove?</p> <p>14 A Correct.</p> <p>15 Q They are not saved to your desktop at</p> <p>16 Perigrove; they're not saved anywhere else?</p> <p>17 A No, they are. They're saved on a drop</p> <p>18 box.</p> <p>19 Q On a drop box?</p> <p>20 A Correct.</p> <p>21 Q Okay. And who controls that drop box?</p> <p>22 A Perigrove.</p> <p>23 Q Okay. And that drop box contains the</p> <p>24 records of M2 Loanco, LLC?</p> <p>25 A As well.</p>
58	<p>1 Q Would you hand-deliver copies to</p> <p>2 Mr. Rubenstein and Mr. Shapiro of the financials?</p> <p>3 A I don't recall, but it's either/or,</p> <p>4 either hard copy or email.</p> <p>5 Q And if it was hard copy, how would you</p> <p>6 deliver that to Mr. Rubenstein?</p> <p>7 A Hard copy in the office.</p> <p>8 Q In whose office?</p> <p>9 A Perigrove's office.</p> <p>10 Q Okay. And with Mr. Shapiro, you said,</p> <p>11 same answer, hard copy in the office; is that</p> <p>12 right?</p> <p>13 A Correct.</p> <p>14 Q And whose office?</p> <p>15 A Perigrove.</p> <p>16 Q Okay. And that's the office in</p> <p>17 Suffern?</p> <p>18 A Correct.</p> <p>19 Q Does M2 Loanco, LLC keep any internal</p> <p>20 records regarding the loans made that M2 Loanco is</p> <p>21 the lender on?</p> <p>22 A Electronically.</p> <p>23 Q Is that a "Yes"?</p> <p>24 A I said "Yes, electronically."</p> <p>25 Q Electronically, okay. So let's talk</p>	60	<p>1 Q I didn't catch that.</p> <p>2 A As well.</p> <p>3 Q As well as what?</p> <p>4 A As perigrove.com, IL@perigrove.com.</p> <p>5 Q Okay. Who -- and you have access to</p> <p>6 this drop box.</p> <p>7 A Right.</p> <p>8 Q And that's where the non-email records</p> <p>9 of M2 Loanco, LLC are maintained?</p> <p>10 A Some of them, yeah.</p> <p>11 Q Where are the others?</p> <p>12 A IL@perigrove.com.</p> <p>13 Q So, other than IL@perigrove.com and</p> <p>14 this drop box, is there anywhere else that</p> <p>15 M2 Loanco files are held?</p> <p>16 A Attorneys.</p> <p>17 Q You're saying the attorneys for</p> <p>18 M2 Loanco, LLC have --</p> <p>19 A Attorneys, accountants.</p> <p>20 Q Okay, so let's drill down on that.</p> <p>21 When you say attorneys have the records</p> <p>22 of M2 Loanco, LLC, which attorneys are you talking</p> <p>23 about?</p> <p>24 A I believe we went through this in the</p> <p>25 last hour who the attorney for M2 Loanco is and</p>

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16 (61 to 64)

61	<p>1 you're asking me where records are kept and --</p> <p>2 Q I am.</p> <p>3 A -- I'm giving you -- and I'm giving you</p> <p>4 three locations. Either IL@perigrove.com or the</p> <p>5 drop box or at the attorneys that's representing</p> <p>6 M2 Loanco.</p> <p>7 Q Okay. And those are the attorneys</p> <p>8 we've already discussed?</p> <p>9 A Correct.</p> <p>10 Q Is there anywhere else M2 Loanco has</p> <p>11 records?</p> <p>12 A Not that I'm aware of.</p> <p>13 Q Okay. You said sometimes financials</p> <p>14 would be either email or hard copy. Where are the</p> <p>15 hard copies located?</p> <p>16 A Once I hand over a hard copy, I don't</p> <p>17 have it. We don't keep hard copies of anything.</p> <p>18 We are a paperless office.</p> <p>19 Q So -- but -- but you said it was either</p> <p>20 hard copy or email, so --</p> <p>21 A You asked me -- you asked me how did I</p> <p>22 hand over a financial statement to a colleague.</p> <p>23 I said either by email or by hard copy.</p> <p>24 Q Okay. And then would anyone hand you</p> <p>25 financial statements by hard copy or was it all</p>	63	<p>1 MR. KAUFMAN: Nick, can we take a bio</p> <p>2 break in the next few minutes?</p> <p>3 MR. ZLUTICKY: Yeah, I think this is</p> <p>4 just as fine a point as any. Why don't we take</p> <p>5 ten?</p> <p>6 MS. D'AMBRA: Okay.</p> <p>7 MR. ZLUTICKY: So we'll stop here and</p> <p>8 we'll reconvene at 11:35 Eastern.</p> <p>9 (Recess taken 11:23 a.m. to 11:35 a.m.)</p> <p>10 BY MR. ZLUTICKY:</p> <p>11 Q Mr. Lefkowitz, are you ready to</p> <p>12 continue?</p> <p>13 A Yes, sir.</p> <p>14 Q So let's go back on the record.</p> <p>15 We were talking about in M2 Loanco's</p> <p>16 loans that it's made.</p> <p>17 So one of the loans that M2 Loanco was</p> <p>18 a lender on was a loan that was originally made to</p> <p>19 various entities that were merged into Corizon</p> <p>20 Health, Inc. Do you recall that?</p> <p>21 A Yes.</p> <p>22 Q So I'm not trying to -- today, we're</p> <p>23 really focused on some specific topics and so I'm</p> <p>24 not trying to get into all of the details of the</p> <p>25 combination merger and the divisional merger.</p>
62	<p>1 done electronically?</p> <p>2 A No, it could be, but if it's a hard</p> <p>3 copy it would have been scanned and stored on</p> <p>4 a disk drive.</p> <p>5 Q Okay. And when you say "scanned and</p> <p>6 stored," where would it be stored?</p> <p>7 A The drop box or email.</p> <p>8 Q And email, you mean IL@perigrove.com?</p> <p>9 A Correct.</p> <p>10 Q Does Alan Rubenstein have a Perigrove</p> <p>11 email account?</p> <p>12 A I don't believe so.</p> <p>13 Q Zalman Shapiro does though; correct?</p> <p>14 A Yes.</p> <p>15 Q When M2 Loanco would enter into</p> <p>16 amendments to credit -- to its credit agreement</p> <p>17 with, formerly Corizon, now known as YesCare, how</p> <p>18 would M2 Loanco maintain records of those</p> <p>19 amendments?</p> <p>20 MR. KAUFMAN: Object to form.</p> <p>21 THE WITNESS: Same way, email and drop</p> <p>22 box.</p> <p>23 BY MR. ZLUTICKY:</p> <p>24 Q The email being IL@perigrove.com?</p> <p>25 A Correct.</p>	64	<p>1 But I just want to make sure we</p> <p>2 understand one another so I'm asking precise</p> <p>3 questions.</p> <p>4 So, in May of 2022, there was a</p> <p>5 combination merger where Valitas Health Services,</p> <p>6 Inc, Corizon LLC, Corizon Health, Inc, and Corizon</p> <p>7 of New Jersey LLC merged into a single entity</p> <p>8 under Texas law; is that correct?</p> <p>9 A Right.</p> <p>10 Q Okay, and I'm going to refer to that as</p> <p>11 "the combination merger."</p> <p>12 Then after that combination merger</p> <p>13 Corizon Health, Inc, incorporated under Texas law,</p> <p>14 did a divisional merger which resulted in two</p> <p>15 entities, Corizon Health, Inc, which is now known</p> <p>16 as Tehum Care Services, Inc; is that right?</p> <p>17 A I believe so.</p> <p>18 Q And then the other entity that was</p> <p>19 split out in the divisional merger is now known as</p> <p>20 YesCare Corp; is that right?</p> <p>21 A Or CHS Texas.</p> <p>22 Q Or CHS Texas, but it's now known as</p> <p>23 YesCare; is that right?</p> <p>24 A Correct.</p> <p>25 Q And that originally, when the</p>

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17 (65 to 68)

<p style="text-align: right;">65</p> <p>1 divisional merger was, that was CHS TX Inc; is 2 that right? 3 A Correct. 4 Q Okay. And CHS stood for Corizon Health 5 Services? 6 MR. KAUFMAN: Object to form. 7 THE WITNESS: I don't believe so. 8 BY MR. ZLUTICKY: 9 Q Okay. You think it's just a 10 coincidence that it was named CHS. 11 A I don't know. 12 Q Okay. Is CHS an acronym? 13 A I don't know what it is. 14 Q Okay. Did you pick the name? 15 A I didn't pick the name, no. 16 Q Okay. Do you know who did? 17 A No. 18 Q Okay. So there was a loan that was 19 made by M2 Loanco to the entities that combined in 20 the combination merger; are you familiar with that 21 loan? 22 A Yes. 23 Q Okay. In that loan there's an 24 administrative agent called Cortland Capital 25 Market Services LLC. Are you familiar with</p>	<p style="text-align: right;">67</p> <p>1 A Correct. 2 Q And those are the only two places it 3 would be located on M2 Loanco site? 4 A I believe so. 5 Q When you say Cortland's role was 6 servicing, what do you mean by "servicing?" 7 A There is servicing activity that goes 8 on in a loan. 9 Q Okay. Can you describe what that is? 10 A Yes. Keeping calculations, keeping 11 tab, sending statements. 12 Q Does that include collecting payments? 13 A Probably, yeah. 14 Q Cortland then remit the payments to 15 M2 Loanco? 16 A Part of the servicing. 17 Q Is that a "Yes?" 18 A If there was any payments made. 19 Q Was there a written servicing agreement 20 between Cortland and M2 Loanco? 21 A I believe so. 22 Q Who owns Cortland, if you know? 23 A I don't know. 24 Q Do you have any ownership interest in 25 Cortland?</p>
<p style="text-align: right;">66</p> <p>1 Cortland? 2 A Yes. 3 Q What was Cortland's role in the loan 4 that M2 Loanco made to those entities? 5 A Servicing. 6 Q Did you have communications with 7 Cortland about Cortland's servicing of the 8 M2 Loanco loan? 9 A I don't recall. 10 Q Did Alan Rubenstein have communications 11 with anyone at Cortland regarding Cortland's 12 servicing of the M2 Loanco loan? 13 A I don't know. 14 Q Did you ever have communications with 15 Pinju Chiu, P-I-N-J-U, C-H-I-U at Cortland? 16 A I don't recall. 17 Q Do you recall ever having 18 communications with anyone at Cortland? 19 A I don't recall. 20 Q If there are any records of 21 communications between M2 Loanco and Cortland, 22 would those be stored in the IL@perigrove.com 23 email account? 24 A Yes, sir. 25 Q Or the drop box?</p>	<p style="text-align: right;">68</p> <p>1 A No. 2 Q Do you have any ownership interest in 3 any company that owns Cortland? 4 A I don't know who owns Cortland. 5 Q Why did M2 Loanco select Cortland to 6 service the loan? 7 A Because M2 -- I think Cortland was 8 servicing prior to us coming in. 9 Q When you say "us coming in", who is the 10 us in that sentence? 11 A To Holdco. 12 Q And when you say "coming in," what does 13 "coming in" mean? 14 A December of '21. 15 Q That -- that's a date. I'm saying what 16 does "coming in" mean? 17 A Say, Cortland was a pre-existing 18 servicing company to the loan. 19 Q And that's a loan that M2 Loanco 20 acquired in December of '21? 21 A No. 22 Q Okay. So what does "coming in" mean? 23 A Delete the word "coming in." 24 Q I'm sorry? 25 A I say delete the answer "coming in."</p>

Transcript of Isaac Lefkowitz, Designated Representative
Conducted on May 12, 2023

18 (69 to 72)

69	<p>1 Q Well - we're not deleting any of it.</p> <p>2 It's all in the record.</p> <p>3 A So -- so don't delete it. Just -- I</p> <p>4 just misspoke, "coming in." Because you don't</p> <p>5 understand what "coming in" means, so let's get</p> <p>6 away from the word "coming in."</p> <p>7 Q Well, I'm asking what you meant by it,</p> <p>8 that's all.</p> <p>9 A Prior -- prior to my role, Cortland was</p> <p>10 in M2 Loanco prior to my role. I inherited</p> <p>11 Cortland.</p> <p>12 Q Okay. When you say "you," who is the</p> <p>13 "you" in that sentence?</p> <p>14 A Isaac Lefkowitz</p> <p>15 Q Okay. And when you say "inherited</p> <p>16 Cortland," what do you mean "inherited Cortland?"</p> <p>17 A So this is going to be an interesting</p> <p>18 conversation.</p> <p>19 So when I took over the role at M2</p> <p>20 Loanco, Cortland was already the servicing company</p> <p>21 for M2 Loanco.</p> <p>22 Q Okay.</p> <p>23 A It wasn't my election to hire Cortland.</p> <p>24 Q And so you -- assumed you'd engage</p> <p>25 Cortland as the servicer under the servicing</p>	71	<p>1 additional loans.</p> <p>2 BY MR. ZLUTICKY:</p> <p>3 Q Did they make additional loans to</p> <p>4 Corizon, LLC?</p> <p>5 A Yes.</p> <p>6 Q Did they make additional loans to</p> <p>7 Corizon of New Jersey LLC?</p> <p>8 A Made it to the group of entities. I</p> <p>9 don't know exactly to which entity, what funds</p> <p>10 went to.</p> <p>11 Q But M2 Loanco made loans to one or more</p> <p>12 of the entities that entered into the combination</p> <p>13 merger; is that correct?</p> <p>14 A Correct.</p> <p>15 MR. KAUFMAN: Object to form.</p> <p>16 BY MR. ZLUTICKY:</p> <p>17 Q Did Cortland service the other loans?</p> <p>18 MR. KAUFMAN: Object to the form.</p> <p>19 THE WITNESS: I believe so.</p> <p>20 BY MR. ZLUTICKY:</p> <p>21 Q Does Cortland service all of the loans</p> <p>22 that M2 Loanco holds?</p> <p>23 A Except the DIP loan.</p> <p>24 Q So, all of the loans that M2 Loanco's</p> <p>25 made except for the debtor in possession loan</p>
70	<p>1 agreement after you joined M2 Loanco as a director</p> <p>2 in December 2021?</p> <p>3 A I didn't engage them. They were</p> <p>4 engaged already.</p> <p>5 Q And you continued that engagement.</p> <p>6 A Correct.</p> <p>7 Q On behalf of M2 Loanco, LLC?</p> <p>8 A Correct.</p> <p>9 Q But you don't know who engaged them in</p> <p>10 the first place at M2 Loanco?</p> <p>11 A Correct.</p> <p>12 MR. ZLUTICKY: Julie, I don't believe</p> <p>13 we have a copy of that servicing agreement in</p> <p>14 what's already been produced. If we do, then</p> <p>15 that's my error, but if we don't, then please send</p> <p>16 us the servicing agreement.</p> <p>17 MS. D'AMBRA: It's noted.</p> <p>18 BY MR. ZLUTICKY:</p> <p>19 Q Did M2 Loanco make any additional loans</p> <p>20 to the entities that were combined in the</p> <p>21 combination merger?</p> <p>22 MR. KAUFMAN: Object to form.</p> <p>23 THE WITNESS: So made additional loans?</p> <p>24 I don't know what you're talking about, two</p> <p>25 entities and combined, but they did make</p>	72	<p>1 that's been made in this bankruptcy case; is that</p> <p>2 right?</p> <p>3 A Correct.</p> <p>4 Q Who represented M2 Loanco, LLC in the</p> <p>5 negotiation of those loans?</p> <p>6 MR. KAUFMAN: Object to form.</p> <p>7 THE WITNESS: We went through this line</p> <p>8 of questioning before, who the attorneys for</p> <p>9 M2 Loanco was.</p> <p>10 BY MR. ZLUTICKY:</p> <p>11 Q I'm asking who represented M2 Loanco</p> <p>12 not as attorneys but as agents, as directors. Who</p> <p>13 were the individuals who conducted the business of</p> <p>14 M2 Loanco, LLC in negotiating the terms of those</p> <p>15 loans?</p> <p>16 MR. KAUFMAN: Objection to form.</p> <p>17 THE WITNESS: It's the same</p> <p>18 individuals, myself, Mr. Rubenstein, Mr. Shapiro.</p> <p>19 BY MR. ZLUTICKY:</p> <p>20 Q Anyone else?</p> <p>21 A Not that I recall.</p> <p>22 Q What is your role at YesCare?</p> <p>23 A Director and monitor.</p> <p>24 Q Describe what monitor means?</p> <p>25 A Monitor the functionality of the</p>

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19 (73 to 76)

<p style="text-align: right;">73</p> <p>1 business, that the loan is sustainable.</p> <p>2 Q What loan are you talking about when</p> <p>3 you say "the loan?"</p> <p>4 A M2 Loanco's loan.</p> <p>5 Q M2 Loanco has a loan under which</p> <p>6 YesCare Corp is the borrower; is that right?</p> <p>7 A Correct.</p> <p>8 Q And you are a director of both</p> <p>9 M2 Loanco, LLC and YesCare Corp?</p> <p>10 A Correct.</p> <p>11 Q Do you use your IL@perigrove.com</p> <p>12 account to conduct the business of YesCare Corp?</p> <p>13 A Very little. I have a YesCare Corp</p> <p>14 email.</p> <p>15 Q So you have an IL@yescarecorp email</p> <p>16 address; is that right?</p> <p>17 A Correct.</p> <p>18 Q Do you communicate regarding M2</p> <p>19 Loanco's loans using your IL@yescarecorp email</p> <p>20 address?</p> <p>21 A I don't believe so.</p> <p>22 Q Did you check?</p> <p>23 A I said all M2 Loanco business is</p> <p>24 conducted on IL Perigrove. It may have been cc'd</p> <p>25 to IL YesCare but I don't conduct M2 Loanco</p>	<p style="text-align: right;">75</p> <p>1 A I believe it was their in-house</p> <p>2 counsel.</p> <p>3 Q Who is that?</p> <p>4 A Scott King.</p> <p>5 Q Is that J. Scott King?</p> <p>6 A I don't know about the J. I know him</p> <p>7 as Scott King.</p> <p>8 Q You know him as Scott King.</p> <p>9 And Scott King was in-house counsel at</p> <p>10 Corizon Health, Inc?</p> <p>11 A Correct.</p> <p>12 Q Okay. So, under the funding agreement</p> <p>13 M2 Loanco made certain payments on behalf of</p> <p>14 Corizon Health, Inc; is that correct?</p> <p>15 A Correct.</p> <p>16 Q Okay. And you said -- and this was not</p> <p>17 an agreement that Cortland serviced; is that</p> <p>18 correct?</p> <p>19 A Correct.</p> <p>20 Q So, let's talk a little bit about the</p> <p>21 process and how it would work.</p> <p>22 So, who would make the request on</p> <p>23 behalf of Corizon Health, Inc that M2 Loanco make</p> <p>24 an advance or fund a payment?</p> <p>25 A So we had a facilitator agreement with</p>
<p style="text-align: right;">74</p> <p>1 business under IL YesCare.</p> <p>2 Q So is it that you don't recall or that</p> <p>3 you know you didn't?</p> <p>4 A I don't recall and I didn't check.</p> <p>5 Q You did not check; correct?</p> <p>6 A Correct.</p> <p>7 Q So I want to move to the funding</p> <p>8 agreement. Are you generally familiar with the</p> <p>9 funding agreement dated May 5th between M2 Loanco,</p> <p>10 LLC and Corizon Health, Inc?</p> <p>11 A Yes.</p> <p>12 Q And I don't want to go through all the</p> <p>13 details of that funding agreement, which is why</p> <p>14 we're not going to put it up on the screen here,</p> <p>15 but under that funding agreement generally, is it</p> <p>16 your general understanding that M2 Loanco was</p> <p>17 obligated to provide certain funds to Corizon</p> <p>18 Health, Inc under the terms and conditions of that</p> <p>19 agreement?</p> <p>20 A Correct.</p> <p>21 Q Who negotiated the funding agreement</p> <p>22 for M2 Loanco, LLC?</p> <p>23 A White & Case.</p> <p>24 Q And who negotiated the funding</p> <p>25 agreement on behalf of Corizon Health, Inc?</p>	<p style="text-align: right;">76</p> <p>1 a company called Geneva Consulting, so Corizon</p> <p>2 made a request to Geneva and Geneva made it to M2.</p> <p>3 Q So let's talk about that.</p> <p>4 Corizon would make a request to Geneva</p> <p>5 Consulting LLC; is that correct?</p> <p>6 A Correct.</p> <p>7 Q Who at Corizon would make that request?</p> <p>8 A Myself.</p> <p>9 Q You would? Isaac Lefkowitz?</p> <p>10 A Correct.</p> <p>11 Q You would make a request to Geneva</p> <p>12 Consulting LLC; is that right?</p> <p>13 A Correct.</p> <p>14 Q Who at Geneva Consulting LLC would you</p> <p>15 make the request to?</p> <p>16 A There's -- there's a whole group of</p> <p>17 people in Geneva?</p> <p>18 Q What is your role at Geneva Consulting</p> <p>19 LLC?</p> <p>20 A I don't have a role in Geneva.</p> <p>21 Q Do you have any ownership interest in</p> <p>22 Geneva Consulting LLC?</p> <p>23 A No.</p> <p>24 Q Have you ever been a director of Geneva</p> <p>25 Consulting LLC?</p>

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20 (77 to 80)

<p>77</p> <p>1 A I don't believe so.</p> <p>2 Q Have you ever been an officer of Geneva</p> <p>3 Consulting LLC?</p> <p>4 A I don't recall. I don't believe so.</p> <p>5 Q Does Perigrove own Geneva Consulting</p> <p>6 LLC?</p> <p>7 A I don't know who owns Geneva Consulting</p> <p>8 LLC. I don't know the structure of Geneva</p> <p>9 Consulting.</p> <p>10 Q Why was Geneva Consulting engaged under</p> <p>11 a facilitator agreement?</p> <p>12 A To vet the invoices and payments.</p> <p>13 Q Okay. Let's drill down on that.</p> <p>14 So you said to collect the invoices and</p> <p>15 payment; is that right?</p> <p>16 A To verify the legitimacy of it.</p> <p>17 Q So you said you don't know who owns</p> <p>18 Geneva Consulting LLC; is that right?</p> <p>19 A Correct.</p> <p>20 Q Do you know who the officers or</p> <p>21 directors are of Geneva Consulting LLC?</p> <p>22 A No.</p> <p>23 Q Earlier you had said that you, on</p> <p>24 behalf of Corizon Health, Inc, would make a</p> <p>25 request to Geneva Consulting LLC to fund a</p>	<p>79</p> <p>1 A I forgot her last name.</p> <p>2 Q Okay. Anyone else besides Miriam?</p> <p>3 A That was my direct contact.</p> <p>4 Q So your only direct contact was Miriam?</p> <p>5 A Correct.</p> <p>6 Q What about Zalman Shapiro?</p> <p>7 A Could be. I don't recall. Not on a</p> <p>8 daily basis, for sure, no.</p> <p>9 Q Did Zalman Shapiro have a role at</p> <p>10 Geneva Consulting.</p> <p>11 A I don't recall.</p> <p>12 Q So why don't we go ahead and we're</p> <p>13 going to introduce a new exhibit now. Exhibit 2.</p> <p>14 Lisa and Blake, it's the Geneva</p> <p>15 facilitator agreement and it starts with M2</p> <p>16 Loanco, and the Bates number is 6620.</p> <p>17 REMOTE TECHNICIAN: As I've marked this</p> <p>18 as Exhibit 2.</p> <p>19 (Exhibit No. 2 was marked for</p> <p>20 identification.)</p> <p>21 BY MR. ZLUTICKY:</p> <p>22 Q So, Mr. Lefkowitz, this is the</p> <p>23 facilitator agreement that we were discussing a</p> <p>24 moment ago; are you familiar with this document?</p> <p>25 A Yes.</p>
<p>78</p> <p>1 payment; is that right?</p> <p>2 A (Inaudible), to vet.</p> <p>3 Q I'm sorry, I couldn't hear with the</p> <p>4 background noise.</p> <p>5 A I didn't say to fund, I said to vet.</p> <p>6 Q To vet. Okay. So what do you mean by</p> <p>7 vet?</p> <p>8 A We get an invoice from Nick Zluticky</p> <p>9 for a million dollars, who is he? Why are we</p> <p>10 paying it? Why do we own him?</p> <p>11 Q And was Geneva's job to figure out why</p> <p>12 they need -- why M2 needs to pay Nick Zluticky?</p> <p>13 A Correct.</p> <p>14 Q So it's Geneva Consulting's job to</p> <p>15 figure out what the invoice is for and whether M2</p> <p>16 Loanco needs to pay it?</p> <p>17 A Correct.</p> <p>18 Q And who at Geneva Consulting would you</p> <p>19 communicate with about paying an invoice under the</p> <p>20 funding agreement?</p> <p>21 A I would call people there.</p> <p>22 Q Can you name them, please?</p> <p>23 A There's -- there's mainly -- mainly a</p> <p>24 girl by the name of Miriam.</p> <p>25 Q What's her last name?</p>	<p>80</p> <p>1 Q Can you scroll to page -- the very end,</p> <p>2 the last page.</p> <p>3 Okay, so we're going to focus on the</p> <p>4 signatories of the agreement so Corizon Health,</p> <p>5 Inc, it says "Isaac Lefkowitz, authorized</p> <p>6 signatory." Is that your signature on page 5?</p> <p>7 A Yes.</p> <p>8 Q Okay. And you signed it on behalf of</p> <p>9 Corizon Health, Inc; is that right?</p> <p>10 A Yes.</p> <p>11 Q Okay. And then M2 Loanco, LLC, it</p> <p>12 appears to be signed by Alan Rubenstein. Is that</p> <p>13 Alan Rubenstein's signature?</p> <p>14 A I believe so.</p> <p>15 Q And Alan Rubenstein was the other</p> <p>16 director of M2 Loanco, LLC at the time this</p> <p>17 document was signed?</p> <p>18 A Correct.</p> <p>19 Q Okay. And then the facilitator, Geneva</p> <p>20 Consulting, is signed by Zalman Shapiro; do you</p> <p>21 see that?</p> <p>22 A Yes.</p> <p>23 Q And is that Zalman Shapiro's signature?</p> <p>24 A I believe so.</p> <p>25 Q Okay. So Zalman Shapiro had some role</p>

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21 (81 to 84)

<p>81</p> <p>1 in Geneva Consulting when he signed this 2 agreement, did he not? 3 A Right. 4 Q Okay. But you don't know what that 5 role was? 6 A It says authorized signatory. 7 Q I'm just asking you: Do you know what 8 that role was? 9 A It could be -- it could have been 10 counsel to Geneva Consulting then. 11 Q Okay. He was also counsel to M2 12 Loanco; right? 13 A No, to Perigrove. 14 Q You said earlier that he was in-house 15 counsel for M2 Loanco. 16 A I did not say that. I said he was 17 in-house counsel for Perigrove. 18 Q Transcript will say what it says. 19 All right. 20 A Clearly. And you asked me after the -- 21 did M2 Loanco have an inside counsel, and I said 22 no. 23 Q Okay. 24 A The transcript will say what I said. 25 Q Okay. So, did you have communication</p>	<p>83</p> <p>1 Are we on topic 12 now, because I thought you said 2 at the outset that you were skipping 12 today? 3 MR. ZLUTICKY: We are, except what I'm 4 trying to get at is the communications between M2 5 and Geneva, and where those would be located. 6 MR. KAUFMAN: Which topic is -- which 7 topic is that, just -- 8 MR. ZLUTICKY: 14 through 17. 9 MR. KAUFMAN: Okay. All right. Sorry. 10 Continue. 11 BY MR. ZLUTICKY: 12 Q So, Geneva would then determine whether 13 or not an invoice should be paid, and Geneva would 14 make that communication to M2 Loanco; is that 15 correct? 16 A Correct. 17 Q Okay. And who at M2 Loanco would 18 Geneva communicate with? 19 A Myself and Alan. 20 Q How would Geneva communicate with you 21 and Alan about the invoice? 22 A Mainly by phone. It wasn't on each 23 invoice. It was just on a batch. 24 Q So this was done in batches? 25 A Right.</p>
<p>82</p> <p>1 with Zalman Shapiro in his role at Geneva 2 Consulting on the funding agreement? 3 A I don't recall. 4 Q You can take exhibit 2 down, Blake, 5 thank you. 6 So let's walk through the funding 7 agreement process again. 8 So you would communicate to Geneva 9 about an invoice, and Geneva's job was to vet the 10 invoice; is that right? 11 A Repeat that again? 12 Q All right. So you would make a request 13 to Geneva to fund an invoice and it was Geneva's 14 job to vet that invoice; is that right? 15 A No, that's not right. 16 Q Okay. Then what was Geneva's job? 17 A Just to vet, not to fund. 18 Q Okay. So, when Geneva -- so Geneva 19 would vet the invoice; correct? 20 A Correct. 21 Q They would determine whether the 22 invoice should be paid? 23 A Correct. 24 Q And -- 25 MR. KAUFMAN: Nick, can I interject?</p>	<p>84</p> <p>1 Q So you would collect in a group of 2 invoices and then send it to Geneva to vet, and 3 then Geneva would report to M2 Loanco on which 4 invoices should be paid? 5 A No, Geneva would say "I need X amount 6 of dollars to pay invoices." 7 Q And that would be because Geneva had 8 done its job under the facilitator agreement to 9 determine that an invoice should be paid? 10 A Correct. 11 Q And what would M2 Loanco do once it 12 received that request from Geneva? 13 A Give them the go-ahead to pay. 14 Q And how would it be paid? Who would be 15 the -- where would the money come from? 16 A Geneva's account. 17 Q Geneva had a separate bank account? 18 A Yes. 19 Q And Geneva was the owner of that bank 20 account? 21 A Correct. 22 Q And where was that bank account 23 located? 24 A I don't recall. 25 Q How would Geneva get money into its</p>

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22 (85 to 88)

<p>85</p> <p>1 bank account to fund invoices?</p> <p>2 A M2.</p> <p>3 Q M2 would transfer money to Geneva; is</p> <p>4 that correct?</p> <p>5 A Transfer, of course to be transferred.</p> <p>6 Q Okay. And when M2 would transfer money</p> <p>7 to Geneva, would it be out of a bank account that</p> <p>8 M2 owned?</p> <p>9 A I would assume that.</p> <p>10 Q Does M2 Loanco have bank accounts?</p> <p>11 A Yes.</p> <p>12 Q Where are they located?</p> <p>13 A I don't recall. Here in New York.</p> <p>14 Q Anywhere else?</p> <p>15 A I don't believe so.</p> <p>16 Q And when you say M2 Loanco would</p> <p>17 transfer money to Geneva, it would be from one of</p> <p>18 M2 Loanco's bank accounts in New York?</p> <p>19 A Like I said, either they funded</p> <p>20 directly or they caused to be funded.</p> <p>21 Q So on the fund directly part, that</p> <p>22 would be M2 Loanco transferring money to Geneva</p> <p>23 from one of M2 Loanco's bank accounts in New York;</p> <p>24 is that correct?</p> <p>25 A Correct.</p>	<p>87</p> <p>1 a separate law firm that he operated out of?</p> <p>2 A Right.</p> <p>3 Q And that law firm had an escrow account</p> <p>4 where money would be transferred to Geneva;</p> <p>5 correct?</p> <p>6 A Would have, correct.</p> <p>7 Q Okay. And are those the only two</p> <p>8 accounts that M2 Loanco would cause to transfer</p> <p>9 money to Geneva under the funding agreement?</p> <p>10 A I'm not sure. I would need to go back</p> <p>11 to the banking records to see where monies came</p> <p>12 from.</p> <p>13 Q Did money come from Corizon Health, Inc</p> <p>14 to fund Geneva Consulting?</p> <p>15 A I think some money came in, correct.</p> <p>16 Q Okay. And that would be something that</p> <p>17 you -- that you as director of M2 Loanco would</p> <p>18 cause?</p> <p>19 A Correct.</p> <p>20 Q Any other companies that you would</p> <p>21 cause to fund money to Geneva Consulting LLC?</p> <p>22 A Like I said, I would have to go through</p> <p>23 the banking records on each transfer to see where</p> <p>24 it came from.</p> <p>25 Q Okay. And the records of you as M2</p>
<p>86</p> <p>1 Q Okay. So let's now focus on cause to</p> <p>2 be funded. So -- that's a passive sentence. So</p> <p>3 let's break it down a little bit.</p> <p>4 Who would M2 Loanco cause to fund to</p> <p>5 Geneva?</p> <p>6 A Attorney escrow account.</p> <p>7 Q They would cause an attorney escrow</p> <p>8 account to be transferred to Geneva?</p> <p>9 A Correct.</p> <p>10 Q Okay. Which attorney escrow account?</p> <p>11 A Either Rubenstein or Shapiro.</p> <p>12 Q So Rubenstein's law firm had an escrow</p> <p>13 account that would transfer money to Geneva</p> <p>14 Consulting LLC; is that correct?</p> <p>15 A Correct.</p> <p>16 Q And Zalman Shapiro, did he have his own</p> <p>17 escrow account separate and apart from Perigrove?</p> <p>18 A Yes.</p> <p>19 Q And it was just his own escrow account?</p> <p>20 A I don't know his or his firm's.</p> <p>21 Q Is it -- what -- what firm is Zalman</p> <p>22 Shapiro at?</p> <p>23 A I don't recall the name, it's Shapiro</p> <p>24 something.</p> <p>25 Q Okay. But Zalman Shapiro also had</p>	<p>88</p> <p>1 Loanco, LLC's director causing these transfers,</p> <p>2 where would those records be kept?</p> <p>3 A Electronically, same way, email, drop</p> <p>4 box.</p> <p>5 Q The email being the IL@perigrove.com?</p> <p>6 A Correct.</p> <p>7 Q What about IL@yescare?</p> <p>8 A I don't know.</p> <p>9 Q You don't know because you didn't</p> <p>10 check?</p> <p>11 A I know YesCare gets a thousand emails a</p> <p>12 minute, so I don't know what's going on in that</p> <p>13 box.</p> <p>14 Q But you didn't check; right?</p> <p>15 A Correct.</p> <p>16 Q All right. And you've not provided</p> <p>17 that email account to M2 Loanco's counsel at</p> <p>18 Norton Rose; is that correct?</p> <p>19 A Correct.</p> <p>20 Q And we'll get to this later but we're</p> <p>21 going to request that that email be searched for</p> <p>22 all responsive documents as well, but we can talk</p> <p>23 about that at the end.</p> <p>24 Okay. So, moving on to the --</p> <p>25 continuing with the funding agreement here. The</p>

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23 (89 to 92)

89	<p>1 communications that you would have with</p> <p>2 Mr. Shapiro or Mr. Rubenstein to cause their</p> <p>3 escrow accounts to fund money to Geneva to pay</p> <p>4 these payments, how would those records be kept?</p> <p>5 A So, you know, you said you wanted to</p> <p>6 save time so we can get to the 341 meeting, and</p> <p>7 it's going to be over and over this very same</p> <p>8 answer.</p> <p>9 All records relating to M2 Loanco,</p> <p>10 regardless where the records are, in IL Perigrove</p> <p>11 or the drop box or through phone communication,</p> <p>12 period, end of story.</p> <p>13 Q Well, you say "period, end of story"</p> <p>14 but we've gone through a lot of areas where you</p> <p>15 just simply didn't check.</p> <p>16 A I didn't check the IL YesCare. IL</p> <p>17 Perigrove I did check and I handed that over. You</p> <p>18 said at the end of --</p> <p>19 Q Go ahead. Go ahead.</p> <p>20 A No, you go.</p> <p>21 Q But you didn't check IL@yescare and you</p> <p>22 didn't turn that over.</p> <p>23 A I didn't check IL YesCare and I didn't</p> <p>24 check any of the other 12 email addresses that</p> <p>25 I use.</p>	91
90	<p>1 Q Okay.</p> <p>2 A Because mainly M2 Loanco business was</p> <p>3 conducted under IL Perigrove.</p> <p>4 Q Okay.</p> <p>5 MR. KAUFMAN: Just so the record's</p> <p>6 clear, we are in communication with YesCare's</p> <p>7 counsel about production of communications from</p> <p>8 YesCare.</p> <p>9 MR. ZLUTICKY: Thank you. So -- so are</p> <p>10 we and we're -- we're working on that.</p> <p>11 BY MR. ZLUTICKY:</p> <p>12 Q Were there payments made under the</p> <p>13 funding agreement that Geneva did not vet?</p> <p>14 A Not that I know of.</p> <p>15 Q Okay. Who's Sigma Risk Management LLC?</p> <p>16 MS. D'AMBRA: Can we take just a quick</p> <p>17 break?</p> <p>18 MR. ZLUTICKY: Not right now, I'm in</p> <p>19 the middle of a question.</p> <p>20 MS. D'AMBRA: I apologize. I was</p> <p>21 trying to catch you before you started.</p> <p>22 MR. ZLUTICKY: Okay.</p> <p>23 BY MR. ZLUTICKY:</p> <p>24 Q Who is Sigma Risk Management LLC?</p> <p>25 A It's a group of lawyers.</p>	92

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24 (93 to 96)

<p style="text-align: right;">93</p> <p>1 role at Sigma.</p> <p>2 A She's the group leader.</p> <p>3 Q Group leader. So what does -- I'm</p> <p>4 trying to understand here, what does Sigma Risk</p> <p>5 Management LLC do?</p> <p>6 MR. KAUFMAN: Objection to form.</p> <p>7 THE WITNESS: They manage the PLI load</p> <p>8 of Corizon.</p> <p>9 BY MR. ZLUTICKY:</p> <p>10 Q What does PLI mean?</p> <p>11 A Professional liability.</p> <p>12 Q And that's the professional liability</p> <p>13 of Corizon -- when you say Corizon, do you mean</p> <p>14 Tehum Care Services, Inc, or do you mean YesCare</p> <p>15 Corp formerly known as CHS Texas?</p> <p>16 MR. KAUFMAN: Objection to form.</p> <p>17 THE WITNESS: All of them.</p> <p>18 BY MR. ZLUTICKY:</p> <p>19 Q They manage the PLI for both?</p> <p>20 A For -- for Tehum and for Corizon, for</p> <p>21 the bankruptcy, and for YesCare as well.</p> <p>22 Q Does YesCare separately pay Sigma for</p> <p>23 the services that Sigma provides to YesCare?</p> <p>24 A I believe so.</p> <p>25 Q Would that be something that you know</p>	<p style="text-align: right;">95</p> <p>1 Q Other than Miriam, whose last name you</p> <p>2 couldn't remember, is there anyone else at Geneva</p> <p>3 Consulting LLC you would communicate with on</p> <p>4 behalf of M2 Loanco?</p> <p>5 A It was mainly my line of communication.</p> <p>6 Q And I know that this line of</p> <p>7 questioning is not your favorite but it's</p> <p>8 important to drill down on it, so I'm going to.</p> <p>9 I just want to --</p> <p>10 A Every question -- every question is</p> <p>11 favorite.</p> <p>12 Q The communications that you had with</p> <p>13 Miriam were -- would be on your IL@perigrove.com</p> <p>14 email account or stored in Dropbox; is that</p> <p>15 correct?</p> <p>16 A Or by phone.</p> <p>17 Q Or by phone.</p> <p>18 Okay. So you would call Miriam and</p> <p>19 talk about M2 Loanco issues regarding the funding</p> <p>20 agreement?</p> <p>21 A Or why Nick needs to get a million</p> <p>22 dollars.</p> <p>23 Q Okay. Well, I like the sound of that.</p> <p>24 A That was the example we used.</p> <p>25 Q Yeah, that's a great example. So let's</p>
<p style="text-align: right;">94</p> <p>1 in your capacity as director and monitor of</p> <p>2 YesCare?</p> <p>3 A Correct.</p> <p>4 Q Who else would M2 Loanco communicate</p> <p>5 with at Sigma Risk Management LLC besides Jennifer</p> <p>6 Finger?</p> <p>7 A So there's a group of 12, mainly</p> <p>8 through Jennifer.</p> <p>9 Q There's a group of 12 employees of</p> <p>10 Sigma Risk Management LLC?</p> <p>11 A Employees and I believe they're the</p> <p>12 owners of the company as well.</p> <p>13 Q Jennifer Finger's an owner of Sigma</p> <p>14 Risk Management?</p> <p>15 A Correct.</p> <p>16 Q Have you ever personally received money</p> <p>17 from Sigma Risk Management LLC?</p> <p>18 A No.</p> <p>19 Q Has M2 Loanco, LLC received any money</p> <p>20 from Sigma Risk Management LLC?</p> <p>21 A No.</p> <p>22 Q Has M2 Holdco?</p> <p>23 A No.</p> <p>24 Q Has Perigrove?</p> <p>25 A No, not that I'm aware of.</p>	<p style="text-align: right;">96</p> <p>1 stick with that. So in this batch of invoices it</p> <p>2 says Nick gets a million dollars, what's Geneva's</p> <p>3 job with respect to the Nick invoice?</p> <p>4 MR. KAUFMAN: Nick, this -- this is in</p> <p>5 that topic 12? If you want to talk about</p> <p>6 communications and where they are, that's fine,</p> <p>7 but I think you're straying into topic 12.</p> <p>8 MR. ZLUTICKY: Well, I get that, but</p> <p>9 I'm also trying to figure out what work product</p> <p>10 Geneva generated that would be available and</p> <p>11 provided to M2 so it does relate to --</p> <p>12 MR. KAUFMAN: That's fine.</p> <p>13 MR. ZLUTICKY: But that's where I'm</p> <p>14 headed.</p> <p>15 MR. KAUFMAN: Ask that question. Why</p> <p>16 don't we do this: Why don't you ask that question</p> <p>17 so that the record's clear.</p> <p>18 BY MR. ZLUTICKY:</p> <p>19 Q What documents would Geneva</p> <p>20 Consulting LLC produce as a result of receiving an</p> <p>21 invoice from Corizon Health, Inc?</p> <p>22 A It would produce payments.</p> <p>23 Q What records would Geneva Consulting</p> <p>24 LLC have that show that the payment -- that the</p> <p>25 invoice was vetted?</p>

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25 (97 to 100)

<p style="text-align: right;">97</p> <p>1 A I don't know if there's vetting of the</p> <p>2 records. There's an invoice, there's due</p> <p>3 diligence, there is approval and there's payment.</p> <p>4 So I don't know if there was any records.</p> <p>5 Q You don't know if there's any records?</p> <p>6 A I haven't seen vetting records. I</p> <p>7 don't know what a vetting record is.</p> <p>8 Q Well, "vetting" is the term that you</p> <p>9 use, so I'm just trying to get an idea of what</p> <p>10 records exist as part of this process.</p> <p>11 A "Vetting" is a word that's in the</p> <p>12 Webster Dictionary. It's a -- the due diligence</p> <p>13 part of it. So you get an invoice from Verizon</p> <p>14 and it says you have to pay \$200, someone takes</p> <p>15 that invoice and vets it and sees that the invoice</p> <p>16 is a legitimate invoice.</p> <p>17 Maybe it's not to be billed to Corizon,</p> <p>18 maybe it's to be billed to Ian Cross.</p> <p>19 The person that decides that this is a</p> <p>20 bill that's a legitimate bill that needs to get</p> <p>21 paid, Geneva Consulting gets the approval and pays</p> <p>22 it.</p> <p>23 Q And the person at Geneva who would</p> <p>24 communicate with you about that is Miriam; is that</p> <p>25 right?</p>	<p style="text-align: right;">99</p> <p>1 A That is absolutely not a correct</p> <p>2 statement that you just said. I'm going to</p> <p>3 correct you again.</p> <p>4 Q That would be great.</p> <p>5 A M2 Loanco never dealt with individual</p> <p>6 statements. M2 Loanco just dealt with how much</p> <p>7 money is needed to fund for the day, for the week,</p> <p>8 for the month, for the batch. Geneva Consulting</p> <p>9 dealt with the individual invoices.</p> <p>10 Q And so Geneva would send</p> <p>11 a communication to M2 Loanco about how much money</p> <p>12 was needed?</p> <p>13 A Either send a communication or pick up</p> <p>14 the phone and say, "We need X, Y, Z dollars."</p> <p>15 Q And when they pick up the phone, you're</p> <p>16 the one on the other end of that phone; right?</p> <p>17 A Right.</p> <p>18 Q Okay. And so then what would you do?</p> <p>19 A I would tell Alan, "We need to fund X</p> <p>20 amount of dollars."</p> <p>21 Q Okay. And that would be done by phone</p> <p>22 or by email?</p> <p>23 A Mainly by phone.</p> <p>24 Q And then what would Alan do?</p> <p>25 A I don't know. It depends on the</p>
<p style="text-align: right;">98</p> <p>1 A Just in general terms, how much money</p> <p>2 is needed, not on an invoice-by-invoice basis.</p> <p>3 Q And is it one of those issues where you</p> <p>4 never knew Miriam's last name or you just can't</p> <p>5 recall it now?</p> <p>6 A I just can't recall it now. If you let</p> <p>7 me go on my computer, I'll find it.</p> <p>8 Q Sure. Is it Gefner?</p> <p>9 A No.</p> <p>10 Q Okay. Is Miriam David Gefner's?</p> <p>11 A David Gefner's wife has a Miriam which</p> <p>12 have no business relationship whatsoever.</p> <p>13 Q And this is a different Miriam than the</p> <p>14 Miriam you communicate with at Geneva Consulting;</p> <p>15 correct?</p> <p>16 A Exactly.</p> <p>17 Q Okay.</p> <p>18 A Miriam is a Biblical name.</p> <p>19 Q No, I understand. Just like Zluticky,</p> <p>20 there's a ton of us out there.</p> <p>21 A Right.</p> <p>22 Q So you would get a communication from</p> <p>23 Miriam, either by phone or by email, that an</p> <p>24 invoice should be paid and then how would</p> <p>25 M2 Loanco direct that payment?</p>	<p style="text-align: right;">100</p> <p>1 situation.</p> <p>2 Q Well, were there times where you told</p> <p>3 him that, "We need to fund X amount of dollars"</p> <p>4 and he would do nothing?</p> <p>5 A On very large sums, he would question</p> <p>6 and I explained them.</p> <p>7 Q And those were all done on telephone</p> <p>8 conversations?</p> <p>9 A Correct.</p> <p>10 Q And once you explained them or if he</p> <p>11 didn't have questions, what would Alan do?</p> <p>12 A So either we would fund it through the</p> <p>13 M2 loan account or through some escrow account or</p> <p>14 Geneva had money in the account and they funded it</p> <p>15 that way.</p> <p>16 Q Or Corizon Health, Inc?</p> <p>17 A I think there was only one or two</p> <p>18 occasions at Corizon Health.</p> <p>19 Q And who would track the payments in</p> <p>20 terms of the amount of money that M2 Loanco was</p> <p>21 required to fund under the funding agreement?</p> <p>22 A Geneva.</p> <p>23 Q Geneva would track M2 Loanco's funding</p> <p>24 amounts under the funding agreement?</p> <p>25 A Right.</p>

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26 (101 to 104)

<p>101</p> <p>1 Q Would Geneva provide periodic reports 2 to M2 Loanco about that?</p> <p>3 A I don't know if reports or telephone 4 conversations. What are we up to, 5, 10, 15?</p> <p>5 Q There were no written reports?</p> <p>6 A Not that I recall.</p> <p>7 Q Would M2 Holdco ever ask you for 8 reports about the payment of more than 9 \$15 million?</p> <p>10 A I'm the director of both. The buck 11 stops at my desk.</p> <p>12 Q And you would fund \$15 million without 13 any reporting to Perigrove?</p> <p>14 A It was reported when it got the funding 15 agreement approval.</p> <p>16 Q So Geneva Consulting kept track of how 17 much money was spent by M2 Loanco, advanced by M2 18 Loanco under the funding agreement?</p> <p>19 A Right.</p> <p>20 Q They would keep you apprised by phone 21 mainly, and we've already established that 22 M2 Loanco is owned by M2 Holdco is owned by 23 Perigrove.</p> <p>24 A Perigrove 1018.</p> <p>25 Q Would you make any reports to Perigrove</p>	<p>103</p> <p>1 Q What about your YesCare email address?</p> <p>2 A YesCare has a three-year delete, I 3 believe.</p> <p>4 Q Three-year, you said?</p> <p>5 A Yes.</p> <p>6 Q YesCare hasn't even existed for three 7 years. So how could they have a --</p> <p>8 A That's what I'm saying. It has a 9 three-year delete and three years from now, 10 today's email will be deleted.</p> <p>11 Q Understood.</p> <p>12 A I believe so. That's what I -- I'm not 13 sure.</p> <p>14 Q And that would be something that you 15 would know in your capacity as a director and 16 monitor of YesCare?</p> <p>17 A Something that I overheard recently.</p> <p>18 Q Where did you hear that from?</p> <p>19 A I don't recall.</p> <p>20 Q You overheard, as in someone was 21 speaking but not to you?</p> <p>22 A Someone in conversation about the -- 23 you know, may have said that it has a three-year 24 delete. I'm not certain about it.</p> <p>25 Q Do you have any documents that you saw</p>
<p>102</p> <p>1 1018 about M2 Loanco's obligations under the 2 funding agreement?</p> <p>3 A No.</p> <p>4 Q Never?</p> <p>5 A No.</p> <p>6 Q How would M2 Loanco get the 15 million 7 to fund the funding agreement?</p> <p>8 A Various sources.</p> <p>9 Q List them, please.</p> <p>10 A I can't list them without looking at 11 the bank record.</p> <p>12 Q Do you recall any of the various 13 sources?</p> <p>14 A No.</p> <p>15 Q And there are bank records that 16 M2 Loanco has that would show these sources?</p> <p>17 A Like I said, it's either through 18 M2 Loanco directly or through escrow accounts.</p> <p>19 Q Okay. Does M2 Loanco have copies of 20 the bank statements for the escrow accounts?</p> <p>21 A No.</p> <p>22 Q Okay. The email server that you use, 23 the Perigrove email server, does it regularly 24 delete emails after a certain number of days?</p> <p>25 A I don't believe so.</p>	<p>104</p> <p>1 at YesCare's facility?</p> <p>2 A I don't.</p> <p>3 Q Does M2 Loanco?</p> <p>4 A Loanco's for -- probably now for the 5 ninth time, the answer is that M2 Loanco has a 6 drop box and my email. Other than that, they have 7 no documents.</p> <p>8 Q To the extent that you checked; right?</p> <p>9 A To the extent that I know.</p> <p>10 Q Do you know where M2 Loanco, LLC 11 maintains its documents?</p> <p>12 A Probably the same, drop box and my 13 email.</p> <p>14 Q Is that your IL@perigrove.com email?</p> <p>15 A Correct.</p> <p>16 Q And is the drop box the same drop box 17 that M2 Loanco uses?</p> <p>18 A Correct.</p> <p>19 Q Anyplace else?</p> <p>20 A Not that I know of.</p> <p>21 Q Where does Perigrove 1018 LLC maintain 22 its records?</p> <p>23 A Drop box and at IL@perigrove.com.</p> <p>24 Q Is there anyone else at Perigrove that 25 does business on behalf of Perigrove 1018 besides</p>

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27 (105 to 108)

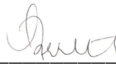
<p>105</p> <p>1 you?</p> <p>2 A Alan Rubenstein.</p> <p>3 Q Anyone else?</p> <p>4 A Not that I know of.</p> <p>5 Q What about Abe Goldberger?</p> <p>6 A Don't believe so.</p> <p>7 Q David Gefner?</p> <p>8 A Don't believe so.</p> <p>9 Q Other than Geneva Consulting, were</p> <p>10 there any other third parties that M2 Loanco used</p> <p>11 with respect to the funding agreement?</p> <p>12 MS. D'AMBRA: Objection to form.</p> <p>13 THE WITNESS: I don't know how much</p> <p>14 Cortland was involved. I can't tell at this</p> <p>15 moment.</p> <p>16 BY MR. ZLUTICKY:</p> <p>17 Q So you think Cortland may have been</p> <p>18 involved in the funding agreement?</p> <p>19 A I don't know.</p> <p>20 Q Were there any other third parties that</p> <p>21 you -- that M2 Loanco had an agreement with other</p> <p>22 than Cortland with respect to the M2 Loanco loans</p> <p>23 to Corizon?</p> <p>24 MR. KAUFMAN: Object to form.</p> <p>25 THE WITNESS: What period?</p>	<p>107</p> <p>1 A Correct. And all I handed over to you.</p> <p>2 Q And they're not stored anywhere else?</p> <p>3 A Again, I think your question was asked</p> <p>4 and answered many times. At the counsel's office.</p> <p>5 Q When you received these records in</p> <p>6 December 2021, were they already in the drop box?</p> <p>7 A No.</p> <p>8 Q Okay. Where were they?</p> <p>9 A I don't know. We took them and we</p> <p>10 scanned them, we loaded them, we uploaded them.</p> <p>11 Where they came from, many different sources.</p> <p>12 Q When did you scan them and upload them</p> <p>13 into a drop box?</p> <p>14 A December of '21.</p> <p>15 Q So when you became director of M2</p> <p>16 Loanco, one of the things was you did was set up</p> <p>17 this drop box; is that right?</p> <p>18 A Correct.</p> <p>19 Q And you started putting documents into</p> <p>20 the drop box that are M2 Loanco documents?</p> <p>21 A Correct.</p> <p>22 Q And before then there was not a single</p> <p>23 repository for all of the M2 Loanco records; is</p> <p>24 that right?</p> <p>25 A I don't know what happened before then.</p>
<p>106</p> <p>1 BY MR. ZLUTICKY:</p> <p>2 Q 2022.</p> <p>3 A I don't believe so.</p> <p>4 Q 2023.</p> <p>5 A I don't believe so.</p> <p>6 Q 2021.</p> <p>7 A I don't know.</p> <p>8 Q When you became director of M2 Loanco</p> <p>9 in December 2021 did you inherit any records</p> <p>10 whatsoever?</p> <p>11 A Yes.</p> <p>12 Q Okay. What records?</p> <p>13 A Phone history.</p> <p>14 Q Where's that loan history stored?</p> <p>15 A Drop box.</p> <p>16 Q Are there any other records that you</p> <p>17 received as director of M2 Loanco when you became</p> <p>18 director of M2 Loanco in December 2021?</p> <p>19 A A lot of records.</p> <p>20 Q Like what?</p> <p>21 A Phone records, tax return records,</p> <p>22 history records, document records.</p> <p>23 Q So a lot of records?</p> <p>24 A Correct.</p> <p>25 Q And those are all in the drop box?</p>	<p>108</p> <p>1 Q Well, you said it came from various</p> <p>2 sources, so it didn't come from one source;</p> <p>3 correct?</p> <p>4 A I don't know which -- at this point</p> <p>5 I don't know what sources it came from, but</p> <p>6 whatever sources it came from, it ended up in my</p> <p>7 drop box.</p> <p>8 MR. ZLUTICKY: So I think I'm about</p> <p>9 done. Why don't we take a quick three-minute</p> <p>10 break.</p> <p>11 (Court reporter appeals)</p> <p>12 MR. ZLUTICKY: Absolutely, yeah. No,</p> <p>13 I understand, I will stick around for spelling</p> <p>14 assistance to the extent helpful. All right,</p> <p>15 thanks.</p> <p>16 (Recess taken 12:42 p.m. to 12:45 p.m.)</p> <p>17 BY MR. ZLUTICKY:</p> <p>18 Q Does M2 Loanco have my written policies</p> <p>19 for how it maintains its records?</p> <p>20 A I don't believe so.</p> <p>21 Q And other than drop box and</p> <p>22 IL@perigrove, M2 Loanco doesn't have any other</p> <p>23 third parties or vendors that keep its records; is</p> <p>24 that correct?</p> <p>25 A That's not correct.</p>

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28 (109 to 112)

<p style="text-align: right;">109</p> <p>1 Q Okay. So can you tell me how that's</p> <p>2 incorrect?</p> <p>3 A We went through that line of</p> <p>4 questioning, that they have service company,</p> <p>5 Cortland and Geneva.</p> <p>6 Q Are there any other service companies</p> <p>7 that M2 Loanco has?</p> <p>8 A Not that I know of.</p> <p>9 Q Are there any other service companies</p> <p>10 that M2 Loanco has used since you became</p> <p>11 a director in December 2021?</p> <p>12 A The question was asked and answered</p> <p>13 that there was none.</p> <p>14 MR. ZLUTICKY: So those are all the</p> <p>15 questions that I have, but before we move to</p> <p>16 anybody else's questions, to the extent that</p> <p>17 anyone may have any, which I doubt, this -- I</p> <p>18 don't believe that this witness has been</p> <p>19 adequately prepared to answer the questions on the</p> <p>20 topics that we discussed and so we're going to</p> <p>21 need to hold this deposition open, and I fully</p> <p>22 expect is that we're going to have a call with</p> <p>23 myself and with Norton Rose Fulbright lawyers to</p> <p>24 talk about what we're going to need to do as far</p> <p>25 as next steps. But for the record I do not</p>	<p style="text-align: right;">111</p> <p>1 CERTIFICATE OF REPORTER - NOTARY PUBLIC</p> <p>2 I, LISA BARRETT, the officer before</p> <p>3 whom the foregoing deposition was taken, do hereby</p> <p>4 certify that the foregoing transcript is a true</p> <p>5 and correct record of the testimony given; that</p> <p>6 said testimony was taken by me and thereafter</p> <p>7 reduced to typewriting under my direction; that</p> <p>8 reading and signing was requested; and that I am</p> <p>9 neither counsel for, related to, nor employed by</p> <p>10 any of the parties to this case and have no</p> <p>11 interest, financial or otherwise, in its outcome.</p> <p>12 IN WITNESS WHEREOF, I have hereunto set</p> <p>13 my hand and affixed my notarial seal this 15th day</p> <p>14 of May, 2023</p> <p>15 </p> <p>16 _____</p> <p>17 LISA BARRETT, RPR, CRR, CRC, CSR</p> <p>18 Certified Court Reporter and Notary Public</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">110</p> <p>1 believe this witness was adequately prepared for</p> <p>2 the topics of which he testified today. We'll be</p> <p>3 addressing that shortly.</p> <p>4 THE WITNESS: Why don't you explain?</p> <p>5 Why don't you explain what's not adequate?</p> <p>6 MR. ZLUTICKY: That's not really a</p> <p>7 discussion for you and me to have. That's for me</p> <p>8 and your attorneys to have. So I think we'll</p> <p>9 probably leave that to me and your attorneys.</p> <p>10 THE WITNESS: It's not the first time</p> <p>11 you were dishonest. You were dishonest to the</p> <p>12 court too when we provided documents and you said</p> <p>13 you didn't receive the documents.</p> <p>14 I'd like to know, sitting here and</p> <p>15 answer your every single question truthfully, what</p> <p>16 is not adequate?</p> <p>17 MR. ZLUTICKY: Yeah, does anybody else</p> <p>18 have any questions? Okay. Then I think we're</p> <p>19 finished. Thank you so much.</p> <p>20 --- Whereupon the deposition concluded at 12:48 p.m.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	

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29

A			
aaron	99:1, 108:12	71:1, 71:3, 71:6	17:13
2:18	access	address	agreement
abe	60:5	5:20, 6:1,	3:13, 62:16,
23:6, 23:9,	account	9:11, 10:10,	67:19, 70:1,
23:21, 91:20,	11:13, 32:8,	10:13, 10:15,	70:13, 70:16,
105:5	32:10, 32:21,	11:16, 26:24,	74:8, 74:9,
able	32:23, 33:1,	35:10, 37:8,	74:13, 74:15,
31:14	33:7, 33:15,	41:19, 49:15,	74:19, 74:21,
about	35:13, 37:2,	49:19, 49:21,	74:25, 75:12,
6:13, 9:10,	51:15, 51:18,	52:17, 73:16,	75:17, 75:25,
11:23, 12:2,	51:22, 59:13,	73:20, 103:1	77:11, 78:20,
16:3, 16:6,	62:11, 66:23,	addresses	79:15, 79:23,
16:15, 17:20,	73:12, 84:16,	37:18, 37:19,	80:4, 81:2,
23:22, 24:7,	84:17, 84:20,	37:22, 41:10,	82:2, 82:7,
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37:8, 40:22,	86:8, 86:10,	addressing	95:20, 100:21,
41:6, 44:2,	86:13, 86:17,	110:3	100:24, 101:15,
44:8, 44:11,	86:19, 87:3,	adequate	101:18, 102:2,
45:14, 46:8,	88:17, 95:14,	110:5, 110:16	102:7, 105:11,
47:3, 48:10,	100:13, 100:14	adequately	105:18, 105:21
48:25, 49:8,	accountant	109:19, 110:1	ahas
50:4, 50:12,	56:1, 56:9,	administrative	6:24
50:16, 51:13,	56:10, 56:13,	65:24	ahead
51:22, 52:5,	56:15, 56:17,	advance	79:12, 89:19
52:8, 53:21,	56:20	4:20, 75:24	alan
53:25, 54:12,	accountants	advanced	9:23, 14:22,
54:18, 55:6,	56:22, 57:5,	101:17	15:2, 15:6,
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